REAL AFFORDABILITY

An Evaluation of the Bloomberg Housing Program

and

Recommendations to Strengthen Affordable Housing Policy

ASSOCIATION FOR NEIGHBORHOOD AND HOUSING DEVELOPMENT, INC.

ANHD is a membership organization of New York City non-profit neighborhood housing groups engaged in community development and organizing throughout the City. ANHD's mission is to ensure flourishing neighborhoods and decent, affordable housing for all New Yorkers. Leaders of the City's community development corporations founded ANHD in 1974 to provide a unified voice for grassroots housing groups that focus on the needs of working-class and low-income neighborhoods. Over the past 39 years our membership has grown from eight founding members to today's 94 groups.

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Executive Summary

The aftermath of Hurricane Sandy has underscored the challenges facing the leaders and residents of New York City. In the long-term, we know that resilient neighborhoods need an ongoing commitment to strengthen both their physical and civic infrastructure so we are better able to avoid damage and cope with the aftermath of future disasters. In the short term, thousands of people whose homes or businesses were destroyed or damaged will need to find places to live and resources to rebuild their homes, businesses and lives. The community development community, in conjunction with the City and the Federal Emergency Management Agency, has come together to find and relocate all those in need as quickly as possible. However, in a city with rental vacancy rates as low as two percent, this is an enormous challenge. Many families need long-term affordable housing solutions, which were in short supply and very high demand prior to the storm. Hurricane Sandy has only highlighted the importance of ensuring robust affordable housing opportunities for New York City residents. For all of our families an affordable safe home is the foundation to beginning to build up lives and move forward to a better future.

Two-thirds of New Housing Marketplace units are too expensive for the majority of local neighborhood residents.

Mayor Bloomberg's New Housing Marketplace (NHMP) affordable housing development plan is an impressive achievement that took great strides towards creating affordable housing opportunities for residents. It is on track, and will likely meet its goal of developing 165,000 units of affordable housing for New York City. NHMP now stands apart as the largest municipal affordable housing effort in the nation's history.[1] The Mayor's commitment and perseverance, even through a severe economic downturn, makes the achievement all the more remarkable.

Yet despite the thousands of housing units created and the multi-billion dollar investment, many City residents and housing advocates believe that the Bloomberg housing production plan was implemented with significant flaws that undermine the actual impact of the investment on local neighborhoods. The future leadership of our City must take into account the lessons of this experience in order to develop a more effective affordable housing production policy that brings greater impact on our local communities and greater value for the taxpayer investment.

The New Housing Marketplace's weaknesses are not in the number of units created – they are in how well these units match the ***Real Affordability*** needs of New York City communities. While the City has committed to and developed a significant number of affordable housing units under the Bloomberg administration, about **two-thirds of New Housing Marketplace units are too expensive for the majority of local neighborhood residents.**

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[1] For the purposes of this report units 'built,' 'created,' or 'developed' under NHMP refers to all NHMP units – both new construction and preservation.

ANHD is committed to the preservation and development of affordable housing in New York City. We work to ensure vibrant, affordable neighborhoods through advocacy for policies and programs that preserve and develop affordable housing for city residents. To prepare this report, ANHD completed an in-depth evaluation of the Bloomberg administration's New Housing Marketplace to understand the strengths and weaknesses of the initiative. This analysis looks beyond the singular 'units produced' measure reported by the City. Our analysis looks citywide and community-by-community to examine unit size, length of affordability, depth of affordability, geographic location and community impact, all central components in whether a unit is truly accessible to a family or community. Using this comprehensive approach, ANHD was able to assess the Bloomberg housing program's success in providing Real Affordability opportunities to its citizens. ANHD's findings include:

Depth of Affordability:	NHMP's units too often do not meet the actual affordability needs of the neighborhoods in which they were built. Approximately one-third of NHMP units have an upper income limit above the actual New York City median income. **And in half the City's community districts, the majority of units built in the community are too expensive for a household earning the local median income for the neighborhood.**
Length of Affordability:	City housing policy, including NHMP, has not preserved the longterm affordability of the units that are built. Starting in 2017, the City will be at risk of losing an annual average of 11,000 units built with City subsidy and **by 2037, the City could lose the affordability of as many units as were built by NHMP, greatly undermining the value of the City's efforts.**
Location:	**NHMP units were concentrated in a few community districts, although generally for valid development reasons.** Five of the City's 59 community districts account for 30% of all NHMP units built or preserved.
Household Size:	The **NHMP unit sizes largely do match the distribution of household sizes for NYC.** Two-, three-, and four-person households make up 56% of New York City households, with 58% of the NHMP units appropriate to house these size households.

The New Housing Marketplace's singular focus – the 165,000 unit goal – may have eclipsed the broader mission of creating affordable housing opportunities that meet the needs of low- and moderate-income New York City residents. These Real Affordability factors must be to be taken into account in future city affordable housing policies and programs. Specifically, ANHD is recommending:

1 The rent and income levels targeted by future affordable housing developments, while still serving a wide range of households, need to be **better targeted to community need** – right now, much of the housing built under the New Housing Marketplace is unaffordable to the majority of households in the neighborhood in which it is built.

2 Future affordable housing should be **affordable in perpetuity** – the City should not invest in short-term affordability when it has the ability to require truly affordable housing for this and future generations for little-to-no additional public subsidy.

3 The City needs to provide **affordable housing for every neighborhood** – while in many neighborhoods there remains less vacant City-owned land that can be used for affordable housing development, there are a wide array of untapped resources and opportunities for a new affordable housing development focus that can be explored in order to expand the geography of affordable housing development beyond only a few neighborhoods.

4 The City needs to continue to build a **wide range of apartment sizes** – targeting large and small families, as well as non-family households and individuals living alone.

5 The City needs to view housing development not just as providing units, but as **comprehensive neighborhood and community development**. Benefits such as affordable retail options, community services, and environmentally friendly elements need to be part of our housing developments whenever possible.

Not all affordable housing units are created equal in terms of community benefit and taxpayer value.

In order to incorporate this more robust Real Affordability approach, the City needs a new way of measuring success**, and a new way of measuring return on investment**. We know that not all affordable housing units are created equal in terms of community benefit and taxpayer value. The next administration must go beyond simply 'units produced' as a measure of success, and look at the quality and type of these units.

To meet this need, ANHD has developed the ***Real Affordability Index***, a new way of measuring the impact of New York City's affordable housing development and preservation projects. By simply counting "units," production incentives are skewed toward creating smaller, less affordable units, which are superficially less expensive to create but do not necessarily provide the most public benefit. This **Index shifts the focus away from a uniform, singular unit count to a more complete model that takes into account a variety of factors that influence the Real Affordability value of a development.**

We hope the Real Affordability Index will help shape the future of City housing development policy and programs by encouraging the City not to simply develop the largest number of units, but to have the greatest effect on the community for each unit and leverage the highest return to the taxpayer. It incorporates a number of indices to present a more complete analysis of past and future developments' affordability benefit to the community and City. These indices are:

Depth of Affordability:	The income qualifications and restrictions for households seeking to reside in a development, as well as the actual rent or mortgage paid.
Length of Affordability:	The number of years a unit remains income restricted and accessible as affordable housing.
Location:	The location of a development, looking at concentration and distribution of the area's affordable and market-rate rental options, and the community need for greater affordability.
Household Size:	The number of residents served by a development given the number of units and unit sizes.
Community Impact:	The value brought to residents and the neighborhood beyond housing, through additional commercial, community, or other mixed uses included as a part of the development.

As an example, consider two very different affordable housing units, both developed under NHMP, both marketed as "affordable housing" at the same time (January 2011), and in the same neighborhood (Manhattan Community District 10 – Central Harlem).

- Unit A is a studio apartment, rents for $1,492 and the unit's affordability restrictions expire in 30 years.
- Unit B is a three bedroom apartment, rents for $531 and because it's developed by a community-based not-for-profit will remain affordable permanently, benefiting generations to come.

While there may be residents that need both subsidized units, they address two very different household's needs: one unit serves a single resident earning as much as $97,125; the other serves a low-income family of four, five, or six people making no more than $36,760 – slightly more than one third as much as the maximum income for the single person. While both of these units represent an overall success of the New Housing Marketplace – in a city like New York, every unit created is needed and does count – clearly the second unit addresses a greater need and has a greater community impact. These types of differences need to be counted when determining the amount of public resources that should be spent on different types of affordable housing.

Affordable housing policy should be written in a way that most effectively and efficiently responds to the diverse needs of NYC's varied communities and residents.

This new metric is rooted in the belief that **affordable housing policy should be written in a way that most effectively and efficiently responds to the diverse needs of NYC's varied communities and residents.** When calculating which developments are better uses of public resources, considerations like unit sizes, depth of affordability, geographic location, length of affordability, and other community benefits that the development may bring need to be looked at, instead of just the total number of units produced. Addressing the City's growing affordable housing crisis must be a comprehensive, nuanced, and three-dimensional approach for the future. ANHD is committed to making a more robust understanding of affordable housing needs a central part of the conversation, programs and policies going forward.

Introduction

The impact of Hurricane Sandy has been extremely challenging for New Yorkers and has affected all of our lives. Local community groups organized an unprecedented response from Day 1, not only taking charge locally, but reaching across neighborhood and borough boundaries to deliver support to areas in need.

Thousands of people whose homes were destroyed or made uninhabitable without basic services will need to find new places to live for the coming weeks and months. The community development community, in conjunction with the City and the Federal Emergency Management Agency, has come together to find and relocate all those in need as quickly as possible. However, in a city with rental vacancy rates as low as two percent, this is an enormous challenge. Many families need long-term affordable housing solutions, which were in short supply and very high demand prior to the storm. Hurricane Sandy has only highlighted the importance of ensuring robust affordable housing opportunities for New York City residents. For all of NYC families an affordable safe home is the foundation to beginning to build up their lives and move forward to a better future.

Hurricane Sandy has only highlighted the importance of ensuring robust affordable housing opportunities for New York City residents.

Mayor Bloomberg's affordable housing development plan, the New Housing Marketplace, is an impressive achievement. It will most likely meet its goal of developing and preserving 165,000 affordable housing units for New York City. This multi-billion dollar investment now stands apart as the largest municipal affordable housing effort in the nation's history. The Mayor's commitment and perseverance, even through a severe economic downturn, makes the achievement all the more remarkable.

Despite the thousands of housing units created and the billions of dollars invested, many City residents and housing advocates feel the Bloomberg housing production plan has been implemented with significant flaws that undermine the actual impact of the investment on local neighborhoods. New York City's leadership must take into account the lessons learned from this experience in order to develop a more effective affordable housing production policy that can have greater impact on local communities and greater value for the taxpayer investment.

For too many New York City families and communities, the City's sizeable investment has not had the maximum impact on their community. Local housing advocates have frequently noted a stark mismatch between the units produced by the City and the needs of the residents in the communities they serve. As one local not-for-profit affordable housing developer explained, "For our last lottery, we received thousands of applications from interested tenants. The vast majority of them, however, did not earn enough to meet the City's guidelines."

These concerns, voiced by both residents and housing advocates, capture the disconnect between the City's momentous goal and the on-the-ground reality. While the New Housing Marketplace met an unprecedented benchmark, it misaimed by not taking into account the various aspects of affordable housing development that make a unit truly impactful for a family and the community. This is largely due to the fact that the City uses a single, linear measure to gauge the impact and effectiveness of their housing production program: the number of units created.

Yet, we know that not all affordable housing units are created equal. A subsidized studio apartment renting for $1,492 that is only affordable for 30 years is different from a permanently affordable, three-bedroom apartment renting for $531. The second unit:

- **a)** Houses more people – a household of 4 to 6 persons versus a single individual.
- **b)** Is affordable for a longer time period – permanent affordability versus expiring in 2041.
- **c)** Serves a household with a substantially lower-income and very limited options in the City's expensive rental market – one with a total annual income of no more than $36,760 as compared to subsidizing an individual earning as much as $97,125.

In the future, the City must take a more nuanced, neighborhood specific approach that reflects the type and quality of the housing, not just the amount built.

But yet, both of these units were identically counted and celebrated by the City as "one affordable unit" successfully developed. While producing a significant number of units is a very important part of addressing the City's affordable housing shortage, the actual impact of each unit on the local community and the value created for the taxpayer also needs to be understood. This means including the depth of affordability, the length of affordability, the number of people served per household, and the additional services and benefits the housing brings.

In the future, the City must take a more nuanced, neighborhood-specific approach that reflects the type and quality of the housing, not just the amount built. The next mayor must tailor the affordable housing programs and policies to better reflect the City's demographics and respond to the varied needs of residents and communities across the five boroughs. And the City must work to better maximize the value of the affordable housing effort and investment to the taxpayer and the community.

This paper presents the finding of ANHD's evaluation of the type of housing constructed and preserved during the New Housing Marketplace, based on newly compiled data, and sheds light on why many communities believe the Mayor's plan has not done enough to respond to the shortage of affordable housing most needed in their neighborhoods and the City as a whole. The analysis is broken into sections that investigate where housing was built, the size of units, the depth of the affordability, and the length of affordability. Each section is followed by a series of recommendations that will help the next mayor better ensure that affordable housing matches the public need. They outline alternatives to the limiting 'number of units produced' measure of success, and introduce policies that, combined, present a comprehensive approach that generates Real Affordability for neighborhoods.

Following the New Housing Marketplace analysis is a new ANHD-developed index that can help assess the Real Affordability value of a housing development. This index assesses the public benefit for each dollar of public investment, and measures the return to the taxpayer for dollars invested in affordable housing for past as well as proposed projects.

This report will allow a broader discussion on how New York City – both the current and future administrations – should align its resources and affordable housing policy in a way that most effectively and efficiently responds to the needs of our diverse communities and residents. Going forward, we are committed to making a more comprehensive approach that includes unit size, length of affordability, depth of affordability, and community impact as central components in the City's ability to provide Real Affordability opportunities to its citizens.

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The New Housing Marketplace: Strengths and Weaknesses

However, this is the first attempt to measure the impact of the New Housing Marketplace along with a wide variety of specific indicators.

Mayor Bloomberg's housing plan has been a great success. It set a goal of 165,000 units, and that goal of 165,000 units will almost certainly be met. In a City where building is expensive and land is scarce, this is no small accomplishment. However, ANHD's in-depth analysis asks the question, what exactly was produced?

There have been previous efforts to analyze the New Housing Marketplace beyond simply "units produced," taking into account things such as the number of Preservation vs. New Construction units, or broad income targets. However, this is the first attempt to measure the impact of the New Housing Marketplace along with a wide variety of specific indicators – geography, unit size, detailed affordability, community impact, length of affordability, and amount of public subsidy spent. ANHD obtained this data through a Freedom of Information Act request from the Department of Housing Preservation and Development (HPD) and the Housing Development Corporation (HDC).[2]

Because of the way HPD and HDC track the details of their units produced, different datasets were available for different indicators and areas of analysis. The largest dataset used is the entire 124,418 units of affordable housing developed from FY2004 – FY2011 under the "New Housing Marketplace," for which ANHD received information on geography and broad affordability levels. For analysis concerning narrower affordability levels and units sizes, smaller datasets had to be used, which are referred to in the relevant sections. For length of affordability, ANHD referred to our previous analysis, first published in the spring of 2010 in our report *A Permanent Problem Requires a Permanent Solution: New York City's Next Affordable Housing Expiring-Use Crisis and the Need for Permanent Affordability*, which tracks the length of affordability for city-sponsored developments from 1987-2007.

Finally, for information on subsidy amounts, ANHD filed a separate Freedom of Information Request for specific HPD and HDC projects chosen at random, and also received detailed subsidy information for all HDC projects. We used this information as a basis for examining our "Return on Affordability" metric at the end, a new way of examining the specific impact of each public dollar spent on affordable housing.

ANHD's analysis allows us to deeply examine the New Housing Marketplace and look beyond the City's single goal and reporting metric: number of units built or preserved.[2] Each section's analysis is followed by policy recommendations that will improve affordable housing development in the City's future.

[2]ANHD would like to thank Meryl Block Weissman at HPD and Melissa Barkan at HDC for facilitating these data requests.

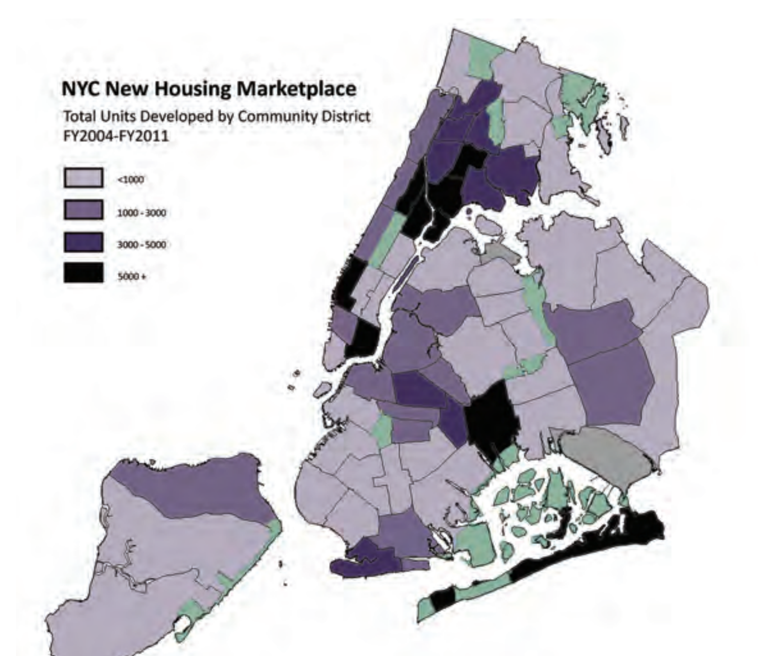
Where Has the Housing Been Built?

This report begins by looking at where units developed under New Housing Marketplace are located. NHMP is a large, robust plan, building housing of varying types throughout all five boroughs. One of the reasons for the plan's success is that it took full advantage of available development opportunities, in particular vacant city-owned land, and city-owned, tax-foreclosed (in rem) housing stock. Because both of these have largely been located in current or formerly distressed neighborhoods, much of the affordable housing development opportunities came in these distressed neighborhoods. As such, the housing built under the NHMP is very unevenly distributed throughout the city. Most of it has been built in low-income, usually very-low income neighborhoods. While some affordable housing has been developed in every community district, **almost half of the community districts (28 of 59) have less than 1,000 units, leaving each of them with less than one percent of all units developed under the NHMP.**

Five community districts make up a huge share of all NHMP development, accounting for 30% of all the affordable housing built or preserved in the City. Of those five community districts, four are in Manhattan: Central Harlem (10,352 units), Chinatown / Lower East Side (7,881 units), East Harlem (7,829 units), and Chelsea / Clinton (6,869 units). The fifth, Melrose / Mott Haven, is in the Bronx and saw 6,545 units built or preserved. **Figure 1** captures the share of affordable housing development by community districts across the City. From this map, we see the grouping of affordable housing development in upper Manhattan, the South Bronx, and Northeast Brooklyn; as well as a lack of development in areas including deeper Brooklyn, Queens and much of Staten Island.

Almost half of the community districts (28 of 59) have less than 1,000 units, leaving each of them with less than one percent of all units developed under the NHMP.

FIGURE 1: **NHMP Total Units Developed by Community District**



Data Source: NYC HPD & NYCHDC

To get a better sense of the NHMP development disparity from one community district to the next, ANHD took a closer look at one borough. **Table 1** below shows all the NHMP housing developed in Brooklyn by the City of New York in each of its 18 community districts. Brooklyn's 30,224 units of affordable housing represent about a quarter of the total units developed under the Mayor's plan; the third highest borough after Manhattan and the Bronx.

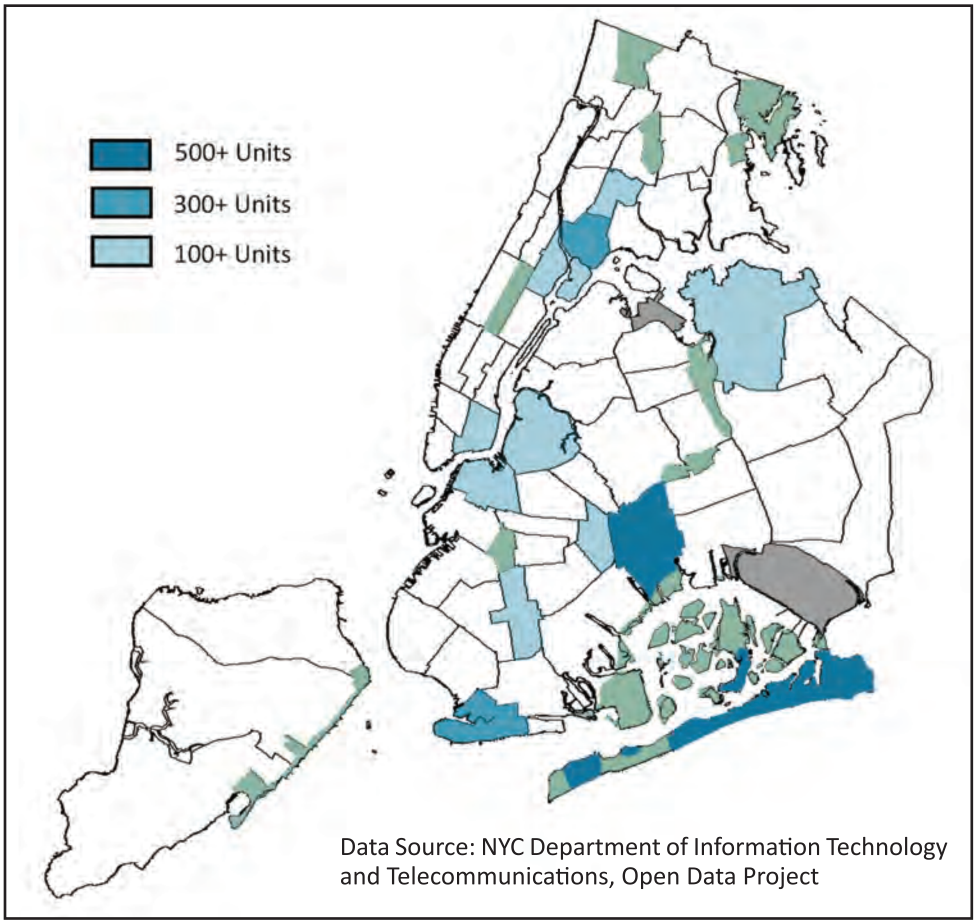
Table 1 clearly shows that the vast majority of Brooklyn's NHMP units are concentrated in just a few community districts. Four of Brooklyn's community districts—Bedford-Stuyvesant (BK3), Cypress Hills / East New York (BK5), Brighton Beach / Coney Island (BK13) and Brownsville / Ocean Hill (BK16)— account for over 50% of the entire borough's affordable housing development. Meanwhile, Bensonhurst (BK11), East Flatbush (BK 17), and Flatlands / Canarsie (BK 18) combined make up just over one percent of the borough's units.

TABLE 1. NHMP Units by Community District in Brooklyn

Community District		Units	% Boro	% City
BK1	Greenpoint / Williamsburg	2,891	9.6%	2.3%
BK2	Brooklyn Hts / Ft. Greene	2,933	9.7%	2.7%
BK3	Bed-Stuy	3,174	10.5%	2.5%
BK4	Bushwick	2,330	7.7%	1.9%
BK5	Cypress Hills / ENY / Starrett	5,269	17.4%	4.2%
BK6	Carroll Gardens / Gowanus / PS	363	1.2%	0.3%
BK7	Sunset Park / Windsor Terrace	451	1.5%	0.4%
BK8	Crown Hts / Prospect Hts	1,468	4.9%	1.2%
BK9	Crown Hts / Lefferts Gardens	1,406	4.6%	1.1%
BK10	Bay Ridge / Dyker Hts	302	1.0%	0.2%
BK11	Bensonhurst / Gravesend	21	0.1%	0.1%
BK12	Borough Park / Kensington	252	0.8%	0.2%
BK13	Brighton Beach / Coney Is.	3,109	10.3%	2.5%
BK14	Ditmas Park / Flatbush	459	1.5%	0.4%
BK15	Sheepshead Bay / Gravesend	1,226	4.1%	1.0%
BK16	Brownsville / Ocean Hill	4,179	13.8%	3.7%
BK17	East Flatbush	233	0.8%	0.2%
BK18	Flatlands / Canarsie	158	0.5%	0.1%
Total		**30,224**	**100%**	**25%**

There are understandable explanations for the geographic disparities within boroughs and across the City. Certain constraints impact a community district's capacity for development, including land availability or zoning restrictions. City-owned vacant land, a main source of real estate for affordable housing, has decreased rapidly over the last two decades. According to an analysis by ANHD, HPD owned vacant land can support approximately 7,537 more units of housing under current zoning. Of these 44% are in a single Community District, Queens CB 14 (Rockaway Peninsula). Given Hurricane Sandy's impact on the Rockaways the City will need to rethink if and how this HPD vacant land could be be used for new affordable housing. Another source of affordable housing development, city-owned, tax-foreclosed housing (in-rem), has all but disappeared. As of June 2010, the City's in-rem stock was only 719 units.

FIGURE 2: Total Development Capacity on HPD-owned land.



The success of the NHMP was that it took full advantage of the development opportunities available, and the result was an unprecedented construction and preservation program leading to over a hundred thousand units of affordable housing. However, all neighborhoods need solutions. Affordable housing is needed throughout the city, not just in certain areas. While some sources for affordable housing development are diminishing, the city can also access new opportunities. New pipelines could enable affordable housing to be built throughout the city, developing equitable housing opportunities that both solve a citywide problem and build political support for affordable housing across the five boroughs.

Recommendations for Future City Policy: Where to Build

Build in all neighborhoods across all community districts to ensure that all parts of the City have affordable housing opportunities.

Under the Bloomberg administration many of the NHMP units were concentrated in a few community districts. However we know that all NYC communities need affordable housing for their residents. While opportunities to develop on HPD-owned land are fewer, a growing population and continuing economic pressures means that more affordable housing will continue to be needed – production will not slow or stop. The next administration has to have a robust, ongoing, strong affordable housing plan. But it will need to take into account the on-the-ground changes, and develop the other potential pipelines and sources for affordable housing development, such as:

1 **Non HPD-controlled City-owned land.** As of February 2012, the City still owned over 1,500 plots of vacant land, controlled by various departments and agencies. Some of these are best used for schools, parks, or other needed infrastructure, but many are optimal sites for affordable housing development. The City must do a comprehensive land inventory and determine a disposition plan that is based on the best use of the land, not the governing agency.

2 **Privately-owned, overleveraged housing stock.** Due to the financial crisis and irresponsible lending, a significant amount of the City's multifamily housing stock now has unsustainable amounts of debt. This leads to harassment and eviction of tenants, and often results in disinvestment and deterioration of the housing stock. The City's ability to provide subsidies and forgive liens presents an excellent opportunity to transform these failing buildings into stable, affordable housing. Even as the current backlog of overleveraged housing is being disposed of, there will be ongoing opportunities to preserve affordable housing in the modest but consistent number of overleveraged and distressed buildings we expect. The city should also continue and expand its effort to transfer and stabilize privately-owned distressed housing through its Third Party Transfer (TPT) program.

3 **Affordable housing leveraged through the zoning code.** The City continues to see enormous development and growth from changes in zoning regulations. This presents an extraordinary and untapped opportunity to systemically incorporate affordable housing into the city's growth. The Bloomberg administration rezoned over 10,000 City blocks; affordable housing must be a part of the next 10,000 blocks that are rezoned. Policies such as inclusionary zoning have only scratched the surface of the possibilities. Through innovative policies like mandatory inclusionary zoning, the City has the ability to create more affordable housing each time a neighborhood is rezoned – at no additional cost to the City.

These alternative sources and pipelines have the advantage of not necessarily being narrowly geographically focused, as is vacant HPD-owned land. This allows the next administration to develop a truly comprehensive housing plan that includes strategies specific to each of the five boroughs. The reality is that in New York City, affordable housing is needed everywhere; in all of our neighborhoods, rents and housing prices are increasingly unaffordable for the local population. The next administration needs to recognize, and respond, to the housing crisis in all of our communities.

Housing for What Size Family?

A strict "units produced" measurement also does not take into account the different unit sizes produced under NHMP and the unit sizes that NYC's communities need. It does cost more money to build a three-bedroom apartment than a studio apartment. However, a three-bedroom apartment houses four-to-six times the number of people as a studio, and therefore has a greater value when looking at "people served" instead of "units produced." As such, housing advocates expected a skew toward smaller apartments under NHMP. However, our analysis indicates that this is not the case: the one place where the New Housing Marketplace has mostly met the needs of New Yorkers is in the size of the apartments it has built.

The New Housing Marketplace has mostly met the needs of New Yorkers in the size of the apartments it has built.

As of ANHD's 2011 data request, the City of New York did not track the unit size on all NHMP developments. Therefore, ANHD's analysis of unit size refers to a subset of 53,211 units built and preserved between FY2004 and FY2010 where unit sizes were included in the City's data.[3] To our knowledge, this is the first time a comprehensive analysis has been performed on the size of units developed by the City.[4]

Overall, the distribution by unit size follows a fairly even normal distribution (bell curve). **Table 2** details the number and percent of units for various bedroom sizes for the FY2004-FY2010 sample. The bulk of these units were one- and two- bedroom apartments, which make up almost two-thirds of the units. Of the 53,211 units in the sample, nearly a third of units (31%) are one-bedroom units and a third (33%) are two-bedrooms. The table shows that NHMP units developed tended not to be on the smallest end of the bedroom size scale, nor the largest.

TABLE 2: Unit Size Distribution for FY2004 – FY2010 Sample

	SRO	0-BR	1-BR	2-BR	3-BR	4-BR	5-BR	6-BR	Unknown	BR Total
Units	123	8,618	16,490	17,606	7,090	1,072	644	18	1,550	53,211
Percent	0.2%	16.2%	31.0%	33.1%	13.3%	2.0%	1.2%	0.1%	2.9%	100.0%

One of New York City residents' top criticisms of NHMP has been that the units developed are not large enough for their families. This criticism depends heavily on a given family's size. For families of three and sometimes four, a two-bedroom apartment is sufficient. However, all families of five or more, some families of four, and even some families of three, need a three-bedroom apartment or larger. Therefore units that are two-bedrooms or larger are often distinguished as "family size" from SROs, studios or one-bedrooms, which serve individuals or couples. By grouping the data from Table 2, ANHD found that about half (47%) the NHMP units serve individuals and couples (i.e., SRO, Studio, or 1 bedroom apartments) and about half (50%) the units are "family size." (i.e., 2+ bedrooms). The remaining 3% of the units were of an unknown size.

[3] The sample includes the following units: all HPD Preservation and HPD New Construction projects started prior to July 2010. A group of pre July 2010 New Construction projects are not in this file if they were completed in the past two years.

[4] ANHD paid HPD to re-configure its database to obtain some of this data.

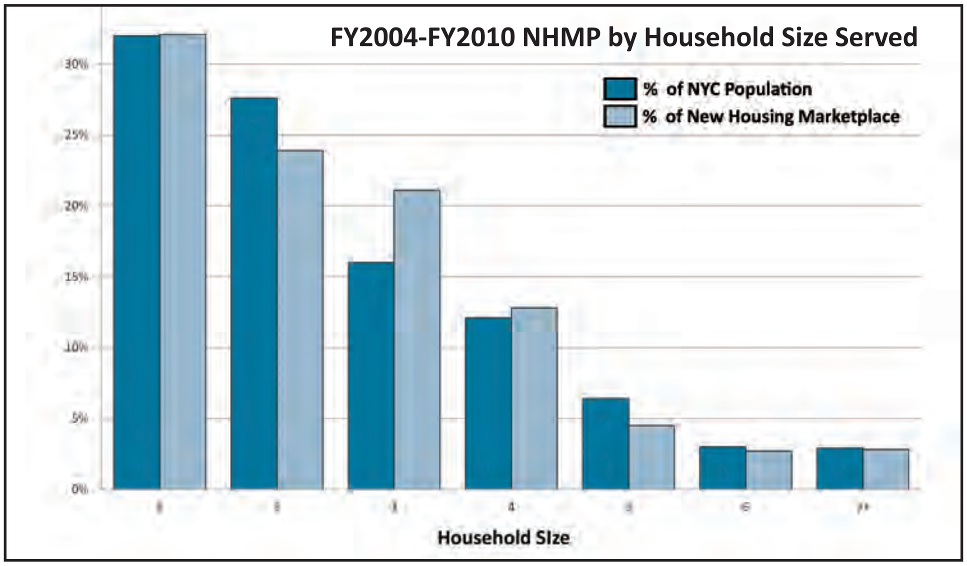
ANHD then compared the FY2004-FY2010 set of New Housing Marketplace unit sizes to the household sizes of New York City, in order to determine if the unit sizes were in alignment with the population at large. To do so, ANHD applied a standard of 1.5 people per bedroom, with 1 person for a studio or SRO. **Table 3** explains how this standard was applied to unit sizes in order to generate the number of persons served at each unit size.

TABLE 3: ANHD Calculated Household Size by Unit Size

Unit Size	ANHD Calculated Household Size
SRO	100% to 1-person households.
0-BR	100% to 1-person households.
1-BR	50% to 1-person households, 50% to 2-person households.
2-BR	25% to 2-person households, 50% to 3-person households, 25% to 4-person households.
3-BR	16.7% to 3-person households, 33.3% to 4-person households, 33.3% to 5-person households, 16.7% to 6-person households.
4-BR	25% to 6-person households, 75% to 7+ person households.
5-BR	100% to 7+ person households.
6-BR	100% to 7+ person households.

Despite the community's criticisms around a lack of "family sized" units, ANHD found that the size of units constructed in the FY2004-FY2010 New Housing Marketplace sample largely mirror New York household sizes. As **Figure 3** shows, there was a slight undersupply of units for two-person households, and a slight oversupply of units for three-person households. But the pattern of the New Housing Marketplace is clear; its apartment size distribution closely reflects the household sizes of New York City – a practice that should continue. However in the future, City data should include unit sizes so that a more detailed analysis can be done. For example, the limited data does not allow ANHD to separate unit size by preservation vs. new construction, or by household income, or rent/own status. This greatly limits ANHD and other housing advocates' ability to understand how unit size influences accessibility to affordable housing for New York City communities and families.

FIGURE 3: ANHD Calculated Household Size by Unit Size



As previously stated, a neighborhood perspective must be taken into account in each analysis. Looking across boroughs, the distribution is less uniform. For example, Manhattan has a larger share of smaller units (54%) compared to family size (45%). Queens, on the other hand, has a much larger share of family size housing (71%) compared to smaller units (29%). When examining bedroom size by community district, the distribution becomes even less uniform. **Table 4** (below) shows the unit size distribution for the 14 Community Districts of Queens. We can see that the unit size distribution varies greatly by Community District, with East/Central Queens (QN 8) featuring 100% small units, and Ridgewood/Maspeth (QN 5) featuring 100% family units. Narrowing the focus to community districts with at least 100 units developed, the range is from 86% small units in Astoria (QN 1), to 89% family units on the Rockaway Peninsula (QN 14), with the remaining community district, Jamaica/St. Albans (QN 12), about evenly split, at 46% small units and 54% family units.

TABLE 4: Number of Bedrooms by Community District in Queens

	Studio	1-BR	2-BR	3-BR	4-BR	5-BR	Total	0-1 BR	2+ BR
QN 1	32	230	39	2			303	262	41
QN 2		16		1			17	16	1
QN 3		3	9				12	3	9
QN 4		1	8	1			10	1	9
QN 5			2	1			3		3
QN 6									
QN 7			4	6			10		10
QN 8		81					81	81	
QN 9		12	1	2		2	17	12	5
QN 10		1	4	8	1		14	1	13
QN 11									
QN 12	41	105	78	87	8		319	146	173
QN 13		2	5	7			14	2	12
QN 14	4	171	696	762	2		1,635	175	1,460
TOTAL	**77**	**6,222**	**846**	**877**	**11**	**2**	**2,435**	**699**	**1,736**

In addition to the FY2004-FY2010 unit size dataset, ANHD was able to gain access to a separate dataset of FY2010 and FY2011 New Housing Marketplace projects that included more detailed information about each unit. This FY2010-FY2011 data includes 9,970 units that were not a part of the 53,211 units in the FY2004-FY2010 sample discussed above. It allowed us to analyze both bedroom size and AMI levels.[6]

Table 5 (below) summarizes this data by number of units. The 51% - 60% AMI band was well represented irrespective of unit size, with studios, one-bedroom, two-bedroom, and three-bedroom apartments all in the top 10 highest subgroups.

TABLE 5: Number of New Construction Projects by AMI and Bedroom Size, FY2010 – FY2011

AMI	Studio	1-BR	2-BR	3-BR	4-BR	Unknown	Total
0%-30%	42	65	41	24	2		174
31%-40%	122	163	150	22			457
41%-50%	303	320	179	46			848
51%-60%	599	1,606	2,009	294	1	5	4,514
61%-65%	1	2	11				14
66%-70%		9	4	6			19
71%-80%	168	401	583	93			1,245
81%-90%	24	26	74	174			298
91%-100%	22	104	165	104			395
101%-110%	5	18	83	28			134
111%-120%		10	6	2			18
121%-130%	44	146	180	75			445
131%-140%	86	43	65	22			216
141%-150%				6			6
151%-160%							0
161%-170%	106	58	88	30			282
171%-180%			1	16			17
Non-restricted	244	345	173	54			816
Super	1	2	65	4			72
Total	**1,767**	**3,318**	**3,877**	**1,000**	**3**	**5**	**9,970**

[6] Data is from a HPD application called OnTrack, a web based tracking application used by HPD's Office of Development to track the loan closing process. The data in these tables was collected by OnTrack for New Construction projects started after July 2010 and a group of pre July 2010 New Construction starts if they completed in the past 2 years.

Recommendations for Future City Policy: What to Build — Size

Build unit sizes that reflect the City's demographic makeup – including revising subsidy levels to reflect the different affordability needs among different size households and to more appropriately reflect the cost of building different size units.

New York City is changing – growing older, more diverse, and increasingly becoming home to non-family households. The size and type of units built needs to continue to reflect the demographics of the City. And more specifically, the units need to reflect the demographics of the neighborhoods where the affordable housing is being built. While smaller units may be more appropriate for Lower Manhattan, where the average household size is less than two people, building a tower of studios in Borough Park, where the average household size is over three, would not meet the community's needs.

In addition to building diverse apartment sizes, the next administration must also adjust subsidy levels of the different size apartments to adequately address the economic realities of the various household sizes. Affordability levels must reflect the incomes of the household sizes for which the apartments are built. For instance, single-person households are, by far, the poorest households in New York City, with the median income just $30,698. A studio apartment renting at $767 dollars is the correct rent for a studio to be affordable to the median income single-person household – however, the City still builds subsidized studio apartments that rent for over $2,200, almost three times this amount.

In addition, the next mayor must revise how housing subsidies are allocated in order to ensure that a range of unit sizes are developed. Units are currently subsidized on a per-unit basis, meaning a studio apartment and 3-bedroom apartment receive the same amount of subsidy from the City. This uniform subsidy regardless of unit size is an unnecessary impediment to building larger unit sizes. In the future, the City must take a more nuanced approach to constructing affordable housing, in this case taking into account that different size households have different affordability needs and different unit sizes require different subsidy levels.

Affordable to Whom?

The Depth of Affordability, or the household income necessary to qualify for an affordable housing unit, is perhaps the most striking shortcoming of current affordable housing development in the City, where units produced is the only measurement of success. New Housing Marketplace makes no distinction between the value of a unit targeting a family of four earning a household income of $24,900 (30% of HUD-determined Area Median Income) versus a unit targeting a family of four earning a household income of $136,950 (165% of HUD-determined Area Median Income). Under the current measure of a per-unit count, these two apartments developed under NHMP are equally applauded. A result of this policy is that much of the New Housing Marketplace has been geared toward the wealthier half of New York City.

What was Built?

Due to the flat "units produced" measure, the City has not always categorized affordable housing by specific income level. Instead, units are labeled as follows:

(1) Low-income (<80% of AMI)
(2) Moderate-income (80%-120% of AMI)
(3) Middle-income (120%-180% of AMI).[7]

Since a large percentage of units developed by the City are financed with Low Income Housing Tax Credits (LIHTC), the City also tracks the "less than 60% AMI" category. Based on these AMI categories the NHMP can report successfully building and preserving over 100,000 units for low-income residents (see **Table 6**). This is because over a third of the units (34%) developed under the NHMP are targeted to households earning less than 60% of AMI. And 4 out of 5 units developed by the NHMP (83%) are targeted to households earning less than 80% of AMI.

TABLE 6: All NHMP Units by AMI, FY2004—FY2011

		NHMP	
		Number	Percent
LOW	0-60%	42,513	34.2%
	61-80%	60,580	48.7%
MODERATE	81-100%	6,356	5.1%
	101-120%	1,842	1.5%
MIDDLE	121-180%	10,431	8.4%
	Non-Restricted	2,273	1.8%
	Super	182	0.1%
	Other	241	0.2%
	Total	**124,418**	**100%**

[7] HUD rental housing programs generally define "low-income" as less than 80% of their adjusted AMI levels, and "moderate-income" as less than 120% of their adjusted AMI levels, and this is the terminology the New Housing Marketplace uses as well. Other programs use different definitions. For instance, when determining low – and moderate – income census tracts for Community Reinvestment Act purposes, "low-income" is defined as less than 50% of AMI. "Moderate-income" is defined as 50%-80% of AMI (which the New Housing Marketplace calls "low-income"), and 80%-120% of AMI is defined as "middle-income" (which the New Housing Marketplace calls "moderate-income"). Some programs don't use a percent of AMI at all, and instead use different indicators, such as multipliers of the poverty level (usually 150%). *The HUD rental housing, and as such the New Housing Marketplace, definition of "low-, moderate-, and middle-income" is higher than any other governmental definition of the terms.*

In FY2009, the City began tracking household income levels in 10% increments, which allows for a much more robust analysis of affordability categories. Table 7 details those units serving households earning less than 80% AMI developed under NHMP between FY2009 and FY2011. Instead of NHMP's broad "low" category, we are able to break down affordability into below 30%, and 10% increments between 30% and 80% AMI.

Looking at **Table 7**, we see that in the past three years of NHMP, the City developed just 3,049 units (7.9% of all FY2009-FY2011 units) for households earning less than 40% AMI, even though this income cohort represents nearly a third of all New York City households. At the same time, the NHMP developed 21,507 units (56% of all FY2009-FY2011 units) for those making 51% - 80% of AMI, an income cohort that represents just 17% of New York City households. So while the NHMP did primarily serve households below 80% AMI, most of these units were targeted at those at the upper end of this spectrum, and a small share of units were targeted at those households most in need.

TABLE 7: Low Income NHMP Units by AMI, FY2009—FY2011

	NHMP	
	Number	Percent
0-30%	1,389	3.6%
31-40%	1,660	4.3%
41-50%	4,606	11.9%
51-60%	14,907	38.6%
61-70%	2,895	7.5%
71-80%	3,705	9.6%

Table 8 (below) shows the number and percent of below 80% AMI units for Community Districts in Manhattan. Eight of the twelve Community Districts in Manhattan did not see any housing developed for households in the lowest income cohort, those earning less than 30% AMI. The four that did – Chinatown/ Lower East Side (MN3), Hamilton Heights / West Harlem (MN9), Central Harlem (MN10), and East Harlem (MN11) – are among the poorest neighborhoods in the borough. In another four Community Districts, Financial District (MN1), West Village / SoHo (MN2), Union Square (MN5), and Stuyvesant Town / Turtle Bay (MN6), no units affordable to households earning less than 50% AMI were built. And in two of these areas (MN1 and MN6), two of the borough's most affluent neighborhoods, there was not a single unit built for any resident making less than 80% of AMI.

TABLE 8: Number of NHMP Low Income Units in Manhattan by AMI and CB, FY2009—FY2011

	0-30%	31-40%	41-50%	51-60%	61-65%	66-70%	71-80%	Total
MN1	0	0	0	0	0	0	0	0
MN2	0	0	0	33	7	0	6	46
MN3	1	3	356	403	1,049	1,157	302	3,271
MN4	0	54	279	37	0	0	10	380
MN5	0	0	0	0	0	0	1	1
MN6	0	0	0	0	0	0	0	0
MN7	0	0	23	361	0	0	1	385
MN8	0	0	7	2	0	0	0	9
MN9	79	68	111	284	29	41	48	660
MN10	38	126	287	1,343	4	1	228	2,027
MN11	23	54	90	1,510	43	0	42	1,762
MN12	0	0	41	118	73	9	31	272
Total	**141**	**305**	**1,194**	**4,091**	**1,205**	**1,208**	**669**	**8,813**

This lack of low- income housing in our wealthiest neighborhoods illustrates a mismatch – **while the City often builds housing targeting households with incomes higher than what is average for a neighborhood, the City rarely builds housing geared towards incomes below what is typical for neighborhood residents.** In fact, only 2.9% of low- and moderate-income housing (120% AMI and below) was built in middle- and upper-income neighborhoods (120% AMI and above).

The use of the terms "low-, moderate-, and middle-income," is misleading and does not reflect the actual income levels of New Yorkers.

These trends are similar in the outer boroughs as well. In Brooklyn, 8 of 18 Community Districts did not see a single unit developed for households earning less than 30% AMI. In the Bronx, 3 of 12 districts saw no housing for this population. In Queens and Staten Island, not only did 9 of 14 districts (Queens) and 2 out of 3 districts (Staten Island) not see any units for households earning below 30% AMI, there were only 13 units of housing for this population built in total throughout these two boroughs.

It is a significant accomplishment that a majority of NHMP units were built for "low-income" residents. But, it is a concern that data from the last two years suggest that most of these units were likely for the top earners in this category. More concerning however, is the use of the terms "low-, moderate-, and middle-income," to label AMI level categories. This labeling is misleading and does not reflect the actual income levels of New Yorkers.

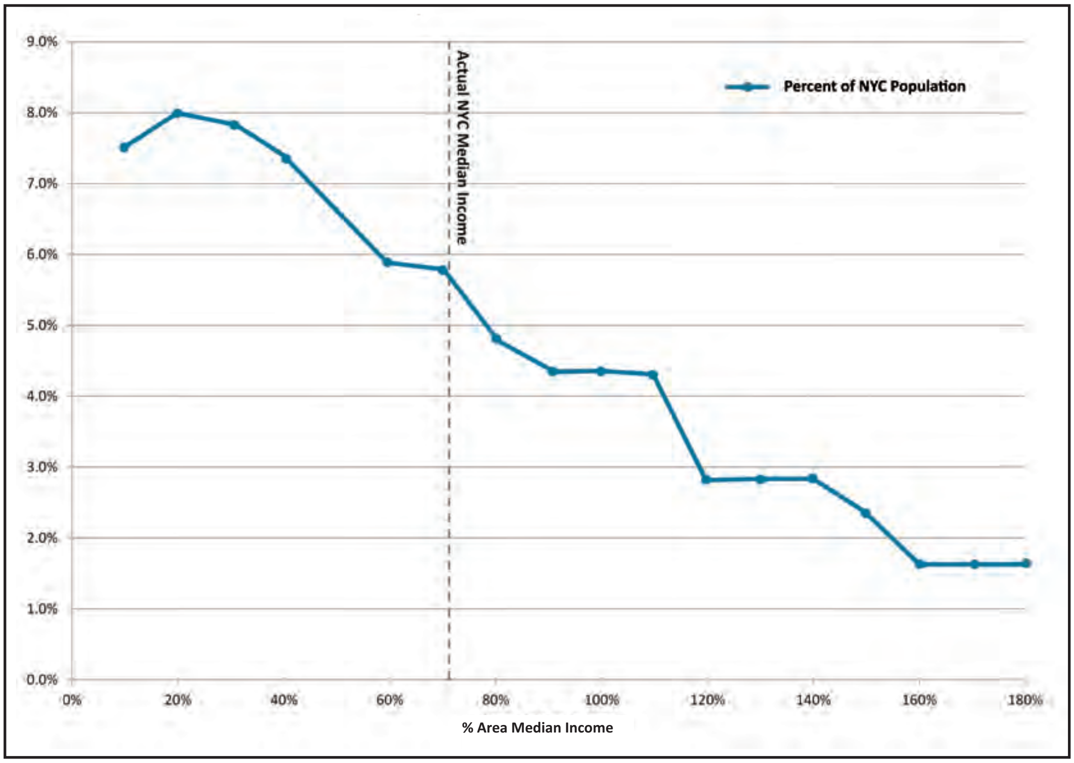
Can Community Residents Afford NHMP units?

In 2010, the median household income for New York City was $48,743 or 71.2% of AMI for an average-sized household. As such, **according to the New Housing Marketplaces' categories, over half of New York City households were "low-income" in 2010.** Likewise, two-thirds of New York City households made less than $75,000, and would be considered below the NHMP's "moderate-income" limit of $82,147. Housing labeled as "middle-income" (120%-180% of AMI) is actually reserved only for a subset of the top one-third of NYC households. The upper limit of "middle-income" is currently set at 165% of AMI, $112,952 for the average-sized household, or $130,680 for a family of four.

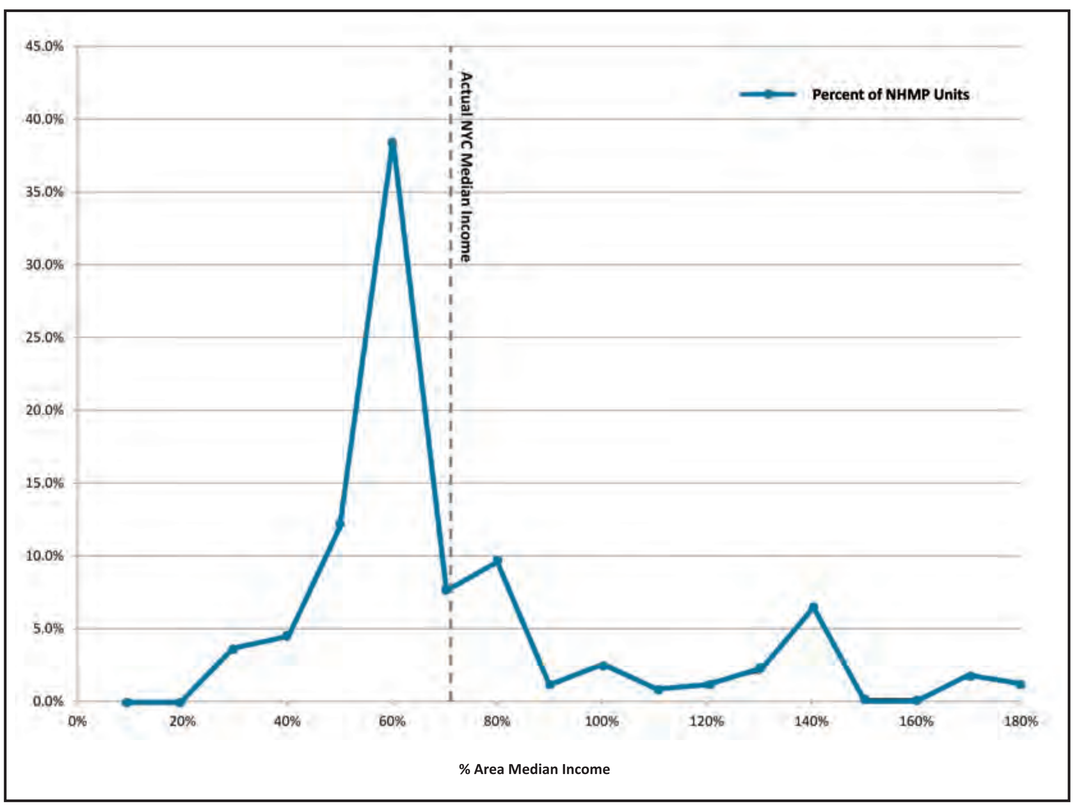
Figure 4 captures the disconnect between the affordability of units built under NHMP in comparison to the actual incomes of New York City households. In the top chart we see that the vast majority of NYC households are at the bottom end of the income scale, especially at the 10% - 50% AMI levels. We can also see the difference between the HUD-defined median income level (100% AMI) and the City's actual median income (vertical line). The bottom chart captures the units built under NHMP. While there is a substantial spike of units at the 60% AMI level, the large share of residents that earn less than 50% AMI are vastly underserved by NHMP.

This is despite a substantial amount of housing being built for the small share of higher-earning households. Over 5% of the NHMP has been built for the 2.9% of New Yorkers at the 140% AMI level – more housing than has been built for the 8% of New Yorkers at the 30% AMI level, despite this population having much more need, and much less access to affordable housing options. This figure illustrates why housing built and hailed by NHMP often does not meet the needs and expectations of communities.

FIGURE 4: Percentage of NYC Population by Percent AMI, 2010



Percentage of NHMP Units Developed by Percent AMI, FY2009 – FY2011



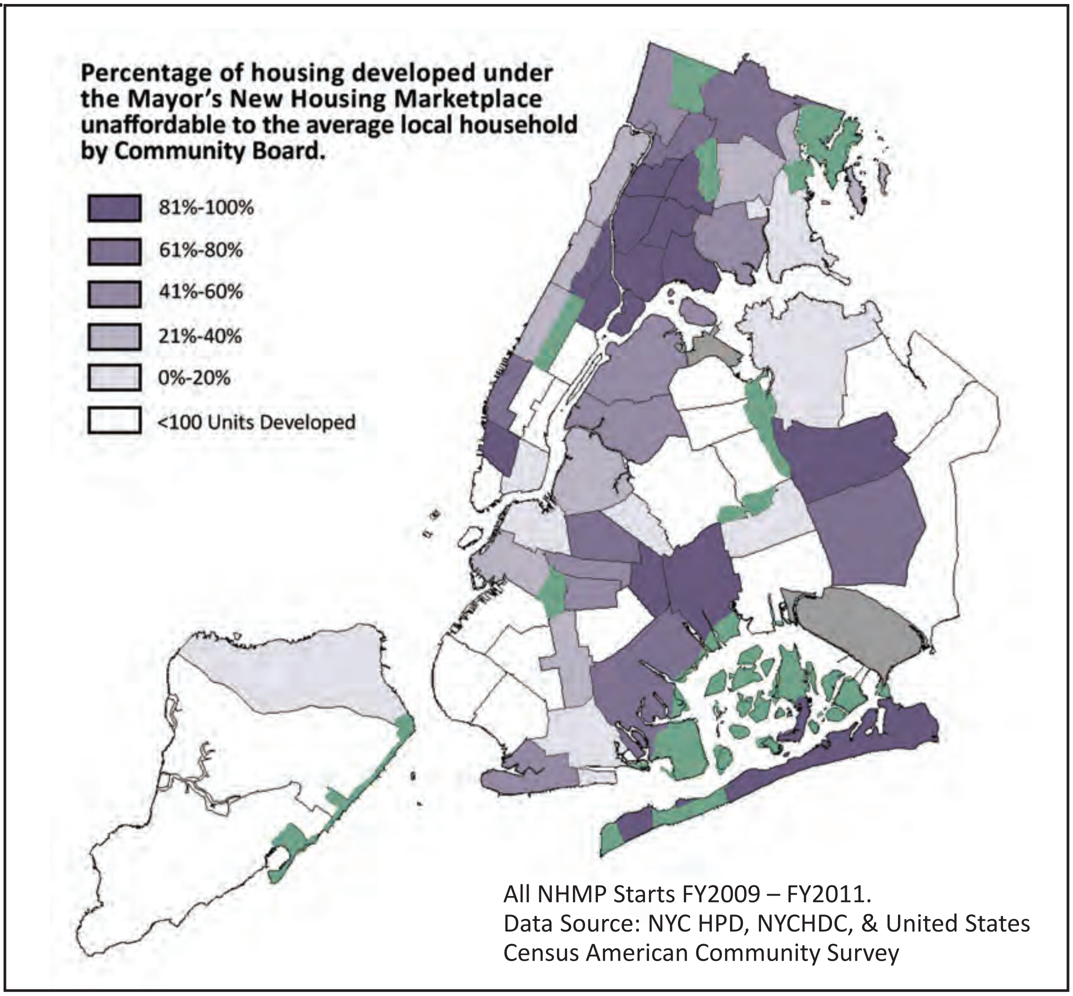
Two-thirds of our affordable housing is actually unaffordable to most neighborhood residents.

The result of this mismatch between AMI and actual median incomes is that much of the New Housing Marketplace has excluded truly low- and moderate-income New Yorkers. Because of the broad affordability categories provided by HPD for FY2004 – FY2008, a detailed analysis of the entire New Housing Marketplace is impossible. We only have detailed affordability data for FY2009 – FY2011. However, the data shows that about a third of the units under the NHMP between FY2009 – FY2011 were available to those making the NYC median income and above.

Furthermore, if we look at the community level, this mismatch becomes even starker. Since only maximum incomes, not minimum incomes (which vary according to program, as well as across the life of the New Housing Marketplace), were provided for the developments in our dataset, we have extrapolated minimum incomes needed to qualify for an affordable development by using a consistent discount of 10% of AMI off of the maximums. Using this method, we calculate that out of the 38,670 units developed NHMP between FY2009 and FY2011, only 13,053 of them (34%) were affordable to households making the median income or less for the typical household in their neighborhood. **Two-thirds of our affordable housing is actually unaffordable to most neighborhood residents.**

Figure 5 illustrates the share of NHMP units developed that were affordable to the average household in each community district across the City. It shows that in a large share of the city, the vast majority of NHMP units were not affordable to the local community. In almost 1/3 of the neighborhoods (13/41) that have seen 100 units or more of affordable housing developed from FY2009-FY2011, 80% or more of these units are unaffordable to the average local household. This is true across the City. We see it in some of the poorest neighborhoods, like Brownsville and Mott Haven, but also in middle-class neighborhoods in Eastern Queens and the North Bronx, and even in one the City's wealthiest neighborhoods, Greenwich Village.

FIGURE 5: Share of NHMP Units Unaffordable to Local Median Income



This disparity is greatest in the City's lowest-income communities. These are areas that have historically experienced disinvestment and blight and are home to many of the City's lower-earning residents. Because of this history of disinvestment they often also tend to be the areas with the most vacant land and development opportunities, and hence, where the most affordable housing has been built. Because of the extremely low household incomes in these neighborhoods relative to the area median income, the City-subsidized housing developed is often unaffordable to the overwhelming majority of their residents.

For example, in NYC's poorest borough, the Bronx, most of the units built under the early years of the Mayor's plan have been targeted to households making less than 80% of AMI (see **Table 9**). In fact, in every Community District, at least 80% of housing developed was either for households earning less than 60% or 61%-80% of AMI and in eight of the twelve community districts, over 90% of the units developed were targeted to these households.

In half of the Community Districts, the average household cannot afford most of the affordable housing being developed in their neighborhood.

However, in every community district in the Bronx the actual median household income is less than 80% of AMI. And in community districts 1 through 6, where almost four-fifths (79%) of the affordable housing in the Bronx has been built, the median household income is less than 40% of AMI, meaning the average household in these community districts does not make enough money to qualify for the vast majority of affordable housing that has been constructed under the New Housing Marketplace in their neighborhood.

TABLE 9: NHMP Units Affordable to Average Household in Bronx by CD, FY09—FY11

	Actual Median Household Income	% AMI (Avg.Size Household)	Total # Units*	Affordable to Average CD Household Number of Units	Pct. of Total Units
BX1	$20,037	28.3%	2,428	45	1.9%
BX2	$20,037	28.3%	2,014	42	2.1%
BX3	$21,617	30.8%	1,455	10	0.7%
BX4	$26,738	37.9%	805	74	9.2%
BX5	$26,131	36.3%	1,428	158	11.1%
BX6	$21,617	30.8%	963	165	17.1%
BX7	$29,179	41.9%	865	57	6.6%
BX8	$52,301	78.4%	393	221	56.2%
BX9	$38,475	54.8%	306	104	34.0%
BX10	$50,893	76.5%	254	247	97.2%
BX11	$45,276	65.3%	173	127	73.4%
BX12	$45,686	64.4%	334	113	33.8%
Total BX			**11,418**	**1,363**	**11.9%**

*Does not include super units or units indicated as other.

The current City policy is to reserve half of all new development units for people living in the neighborhood. However, as the analysis above illustrates, **in half of the Community Districts, the average household cannot afford most of the affordable housing being developed in their neighborhood.** Out of the 41 community districts that saw significant development (100 units or more) from FY2009-FY2011, in half (21 out of 41), the majority of affordable housing was unaffordable to the average household. Given the recognition that local residents should have access to local developments, the City must ensure that the affordable housing opportunities are actually affordable to people in the community.

Why doesn't AMI work?

Despite the disparity in Area Median Income (AMI) and actual NYC median incomes, the City continues to use the elevated numbers in how it defines low-, moderate-, and middle-incomes. Generally, housing is defined as affordable if it does not cost a household more than 30% of their combined annual income, although some City programs have increased this ratio to as high as 35% under this administration.

A key problem is that the incomes used when administering affordable housing programs are much higher than the actual incomes of residents of New York City. Income limits for affordable housing developments are set according to federal guidelines established by the Department of Housing and Urban Development (HUD). These income limits are loosely based on the median income of the New York Fair Market Rent Area (FMR). There are three main factors that skew HUD AMIs higher than actual median incomes for New York City:

1. The NY Fair Market Rent Area includes wealthier suburban counties, such as Putnam County, skewing the median income higher than if it included only the five boroughs.
2. HUD adds an upward adjuster onto its NY FMR income limits, based on the high cost of housing in New York. This "high housing cost" adjuster artificially raised the AMI by 26.1% in 2010.
3. HUD does not look at actual incomes of different household sizes. Instead, they use a multiplier of their determined AMI for four-person households to determine incomes for smaller and larger household sizes. The result is that HUD's incomes for smaller and larger households are significantly overestimated. According to HUD's multiplier, a single-person household should make 70% of what a family of four makes. But in reality, a single-person household in New York City makes just 49% of what a four-person household makes.

HUD's "median income" limits are not at all reflective of the actual median income levels in New York City.

As a result of these policies, HUD's "median income" limits are not at all reflective of the actual median income levels in New York City. For example, **the HUD calculated median income for a family of four in New York in 2010 was $79,200. Yet, the actual median income for a 4-person household in New York City was only $62,799, over 20% lower.**[8]

And if you look by household size, the results become even more skewed. As **Figure 6** shows, the difference in median household income between New York City and the HUD AMI area varies considerably depending on household size, with the ends of the spectrum – single-person and six-person households – showing the greatest discrepancies.[9]

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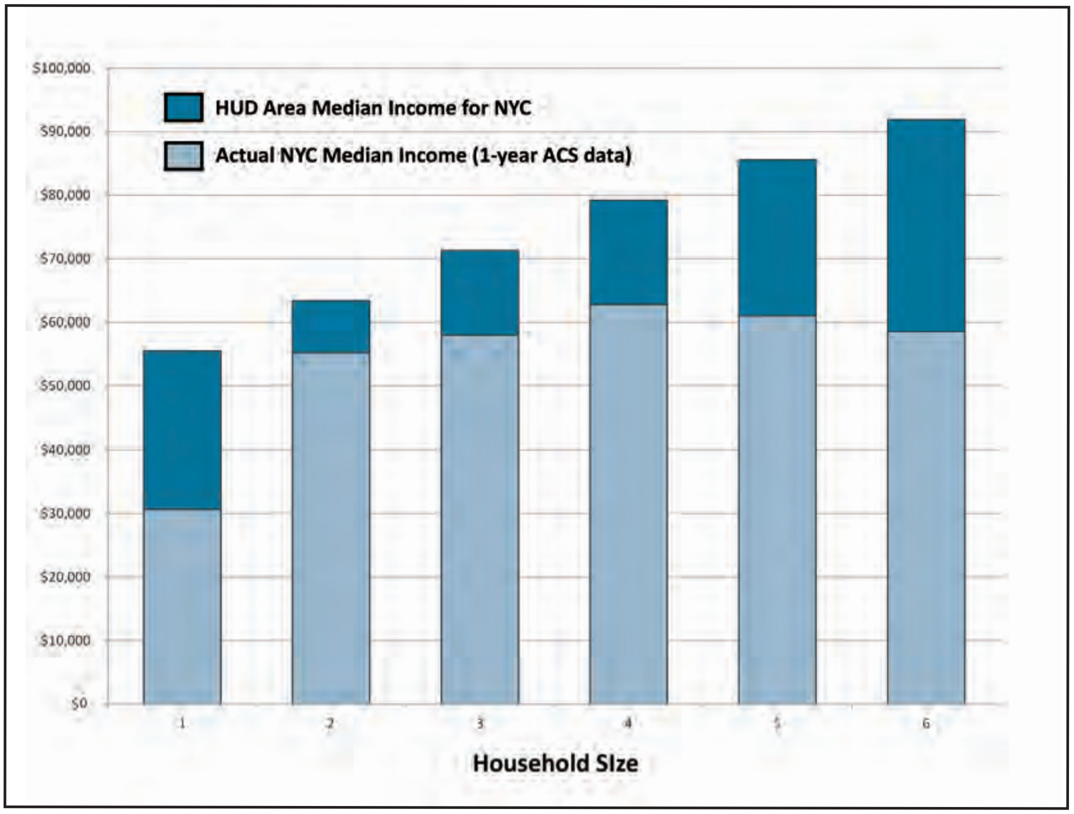
[8] Source: United States Census Bureau. American Community Survey 1-year data for 2010. All income and household size data are 1-year ACS data unless otherwise noted. HUD Median Family Incomes are prorated for the average NYC household size for each year.

[9] HUD only provides median incomes by family size, not overall median incomes. As such, to determine the overall median for HUD, we took the 2-person and 3-person limits, and prorated for the average household size in New York City, which was 2.64 people in 2010.

FIGURE 6: HUD AMI versus NYC Median Incomes by Households Size



This discrepancy between HUD income limits and NYC actual incomes holds true going back to at least 2005. **Table 10** captures the consistent incongruity between HUD AMI in comparison to the actual NYC median incomes. Over the 6-year period from 2005-2010, on average, the actual New York City household median was only 76.4% of the HUD AMI levels.[10]

TABLE 10: 2005-2010 Affordability Comparison

	2005	2006	2007	2008	2009	2010	Overall Average
HUD Area Median Income	$54,169	$61,386	$61,457	$66,636	$66,482	$68,456	
Actual NYC Median Household Income	$43,434	$46,480	$48,631	$51,116	$50,003	$48,743	
% of AMI	80%	76%	79%	77%	75%	71%	**76.4%**

[10] Based on the average household size for that year.

This problem is only further exacerbated by the enormous differences in incomes across boroughs and neighborhoods. Median incomes in New York City vary greatly by borough, and even more so by Community District. **Table 11** illustrates the differences in the median incomes by borough in 2010. The Bronx and Brooklyn's median incomes are far lower than those of Staten Island and Manhattan. The Bronx's median income is less than half of the median income in Staten Island. This has significant impacts on the affordability of NHMP in each borough. Staten Island's median income is consistent with HUD AMI and Manhattan's is close. But, in the Bronx and Brooklyn, where the median incomes are substantially lower than AMI, affordable housing would need to be developed at about the 50% and 70% AMI levels, respectively, to be affordable to the median households in each borough.

TABLE 11: Median Income and Share of AMI by Borough, 2010

	Median Household Income	Percent of Overall AMI
Bronx	$32,568	48%
Brooklyn	$42,143	62%
Manhattan	$63,832	93%
Queens	$53,054	78%
Staten Island	$70,560	103%

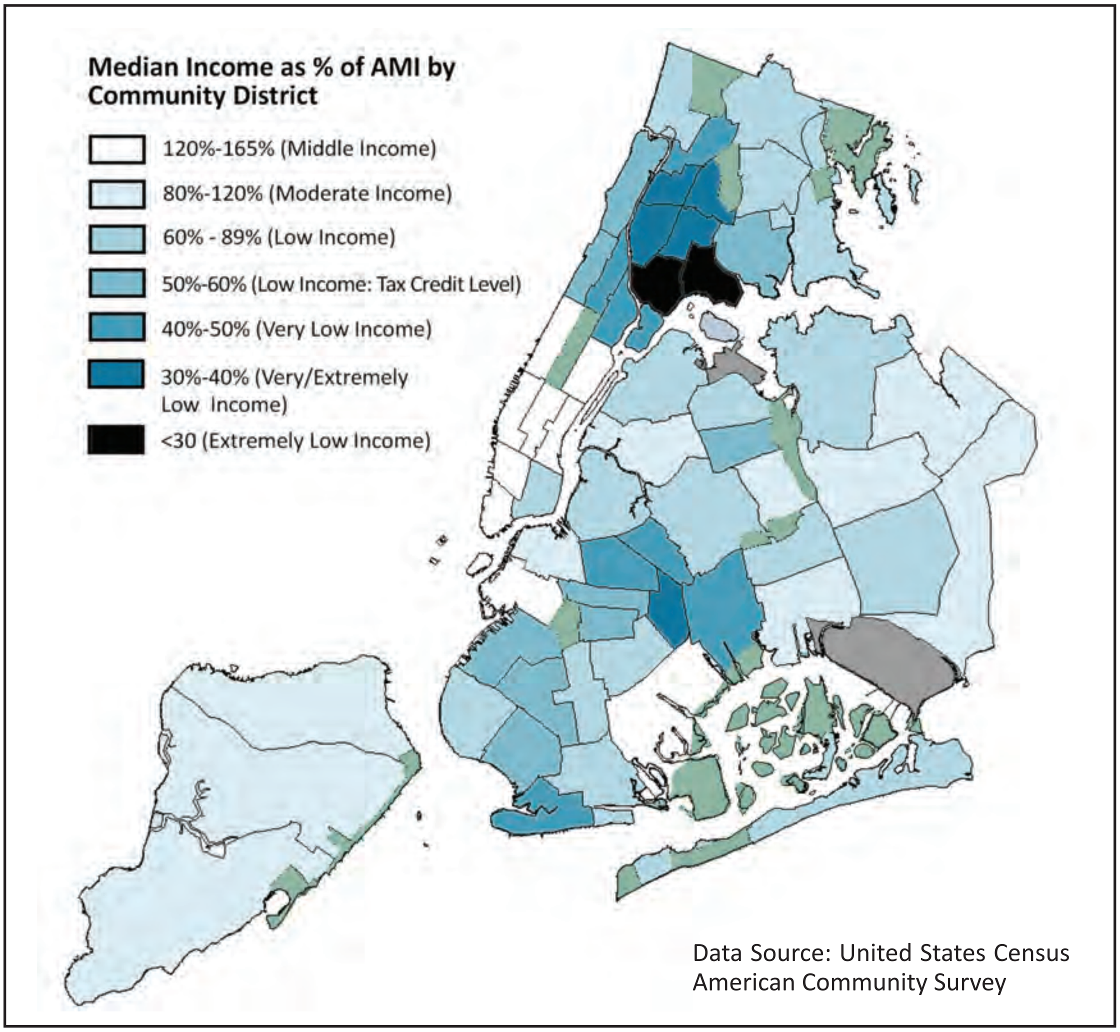
The typical Bronx household would have to make 1.5 times its income in order to be able to afford the majority of the affordable housing built in the Bronx.

To understand the very real implications of using HUD's Area Median Income limits, we can look at a typical affordable housing project built by LIHTC, the federal program that helps finance most of the newly constructed units developed by the City. The program's guidelines require that units serve households earning less than 60% AMI, which in 2010 was $47,520 for a family of four. However, if the actual median income of the City were used, the same unit would be available to a household of four earning as little as $37,679. Furthermore, in New York City's poorest borough, the Bronx, 60% of the median income for a four-person household is just $24,627 – a little more than half of the income limit being used in the City affordable housing programs. **The typical Bronx household would have to make 1.5 times its income in order to be able to afford the majority of the affordable housing built in the Bronx.**

The mismatch between HUD's Area Median Incomes and the actual median incomes at the City and borough levels are especially true when looking neighborhood-by-neighborhood. **Figure 7** shows each Community District's median income as a percentage of AMI. Two-thirds, or 40 of the 59 Community Districts in the City, have median incomes at or below the "Low-Income" limit of 80% of AMI. And every single Community District in New York City, even the wealthiest, has a median income less than the "Middle-Income" limit of 165% of AMI.

The high cost of operating housing in New York, paired with the extremely low incomes of many of its residents, often makes it financially unfeasible to build housing with large numbers of deeply low-income units.

FIGURE 7: Community District's Median Income as Percent of HUD AMI



Why is deeply affordable housing difficult?

While AMI presents a significant challenge to matching program and policy income levels to actual NYC household income, it is only one aspect of the challenge to building affordable housing at the appropriate income depth. Building housing for low-income people, and especially very low-income families, in New York City can be difficult, even with government subsidy and support. While achieving greater depth of affordability is critical, it is multifaceted and requires balancing a number of considerations.

In addition to being affordable, housing needs to be financially stable and of sound quality. This requires the income of a building (the large majority of which is generated from rents) to be sufficient to meet its expenses. The high cost of operating housing in New York, paired with the extremely low incomes of many of its residents, often makes it financially unfeasible to build housing with large numbers of deeply low-income units. Even when developments utilize economies of scale and make use of innovations like energy efficiency that can reduce operating expenses, there is still a baseline level, below which a development simply is not financially sustainable, even without carrying debt. Often times, this baseline is well above what the average households in low- and very low-income neighborhoods can afford. As a result, it is not always financially feasible to build housing at the depth of affordability needed by the community.

Furthermore, these financial structures are constrained by the current Federal, State, and City policies and programs that fund affordable housing development, most notably the LIHTC program. The housing built under the New Housing Marketplace is, in many ways, reflective of these constraints. And given these limitations the affordable housing community has done an admirable job of trying to reach the needs of our low-income residents. They highlight the reality that there are very real financial structures that make it difficult to build at the affordability needed by low-income residents.

However, a sizeable portion of our communities that have long been priced out of market-rate housing are now being priced out of the affordable housing market as well. The City needs to have a housing policy that aligns with the needs of New Yorkers. The solution cannot simply be to leave these families behind without affordable housing opportunities. Nor is it sufficient to rely solely on the federal government to house the millions of New York's very low-income residents. Instead, buildings in higher-income neighborhoods have rents that can support the operating costs of lower-income housing units. And further thinking is needed on how income-mixing in buildings can be better used to cross-subsidize larger numbers of units affordable to the one-third of New Yorkers who make less than 40% of AMI – a level that is widely considered too low to support a building on its own.

A sizeable portion of our communities that have long been priced out of market-rate housing are now being priced out of the affordable housing market as well.

Recommendations for Future City Policy: What to Build—Depth of Affordability

The majority of publically-subsidized units developed in each neighborhood need to be affordable for the majority of residents of the neighborhood - those making the local median income or below.

There is a clear need for more housing options throughout the City, across all income levels. However if these options aren't affordable, the "affordable housing" is simply "housing." The City should not use taxpayer subsidies to build housing unaffordable to the local community– indeed unaffordable to the majority of New Yorkers overall – and then call it "affordable housing."

The next administration must address the disparity between the inflated income levels that the City uses to construct deals, and the actual incomes of New York City residents, especially in the communities where this housing is being built. The City will not address its affordable housing crisis if they continue to prioritize subsidized housing too expensive for most New Yorkers.

Building housing for local families is not a new idea, and is in line with current City practices. It is the City's long-standing policy to reserve half of all available units in a new development for people living in the neighborhood. If we are reserving affordable housing for local residents, we need to make sure that housing is actually affordable to local residents.

In many neighborhoods, this policy will be financially sustainable. In some very low-income neighborhoods, it will be a challenge. The low rents needed in very low-income communities are not sufficient to cover the high construction and operating costs associated with building subsidized affordable housing. The City needs to meet this challenge by income-mixing to a sustainable operating level in these very low-income neighborhoods, and offsetting the loss of deeply affordable units in other, higher-income neighborhoods. The next mayor should:

- Establish a mandatory affordability policy to leverage the market-rate income streams that can generate low-income housing for households below 40% AMI in order to reach those not currently served by other housing programs.
- Allow AMI spreading of all City and State affordable housing programs, which would enable developments to trade-off building units at a slightly higher affordability level in exchange for building deeper affordability units for low-income households which requires greater subsidy. For example, instead of building 16 units at 60% AMI, allow developers to build 8 units at 30% AMI and 8 units at 90% AMI.
- Advocate that Federal affordable housing programs permit AMI spreading as proposed in the Department of the Treasury's Fiscal Year 2013 Revenue Proposals.
- Create a revolving Operating Expense Fund that captures a share of the cash flow overages from higher-income buildings with units over 120% AMI to cross-subsidize very low-income units.

Moving forward, the City has an opportunity to recommit to affordable housing actually being affordable for local residents. The continued demand by developers for City subsidies and land needs to be leveraged into deeper affordability for residents. The City has demonstrated that when it sets a housing policy goal, it can meet it. This has been true of unit targets under New Housing Marketplace, and it can be true of affordability targets under the City's next mayor. The next administration has the ability to build not just housing, but truly affordable housing that stabilizes our communities.

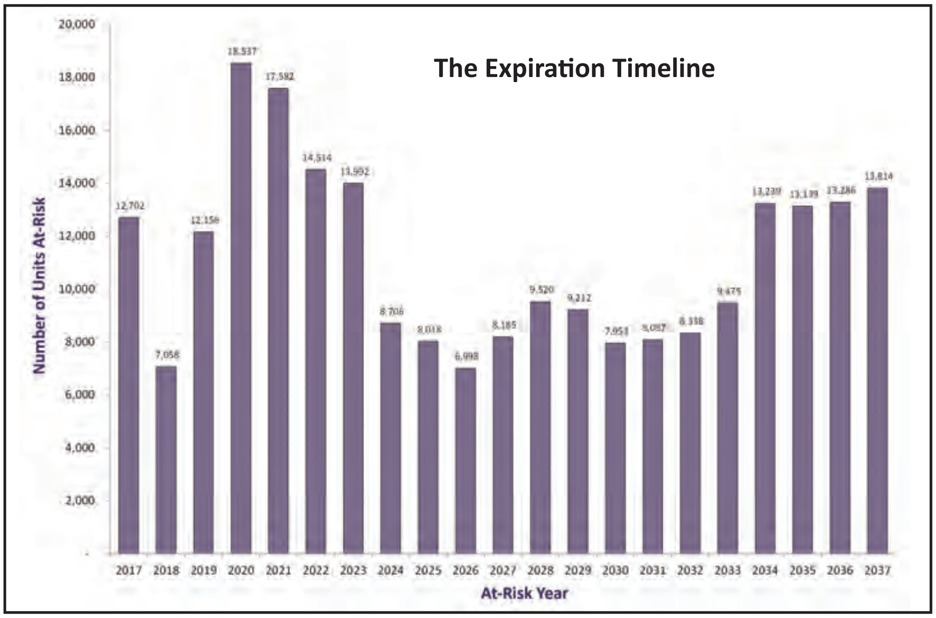
When Will the Affordability Be Lost?

Another question that gets lost is "affordable for how long?" Out of the approximately 125,000 units created during the New Housing Marketplace, almost all of these affordable units will expire: usually after 30 years, but sometimes as long as 50 or 60. Only approximately 2% are required to remain affordable in perpetuity. This short-term affordability creates an enormous challenge for our children and generations to come. Starting in 2017, **NYC will begin losing an average of more than 11,000 affordable units a year.**

Starting in 2017, NYC will begin losing an average of more than 11,000 affordable units a year.

Figure 8 shows the numbers of units whose affordability is at risk of expiring between 2017 and 2037. This captures affordable housing developed under both Mayor Koch's original Ten-Year Plan that was continued by Mayors Dinkins and Giuliani, and the first four years of the New Housing Marketplace. The number of at-risk units closely parallels what will be created or preserved under the rest of the New Housing Marketplace. This potential loss of tens of thousands of units greatly undermines the impact of what the Bloomberg administration has done to create and preserve affordable housing.

FIGURE 8: Number of Units with Affordability Set to Expire by Year



In the late 1980s, two things happened to catalyze affordable housing development – the Low-Income Housing Tax Credit Program, and Mayor Koch's Ten Year Housing plan. During the early years of these, affordability restrictions were only for 15 years. We soon learned this wasn't sufficient, and the LIHTC requirements were extended to 30 years.

Under Mayor Bloomberg, the City has gradually moved toward a policy of incentivizing 50 or 60 years of affordability, although in recent years they have dialed that back and only been requiring the 30 year short-term affordability. Clearly, long-term and, especially, permanent affordability is a much better use of public subsidy than units only affordable in the short-term.

In addition, long-term and permanent affordability does not cost the City additional funds; it can be mandated as part of the affordable housing program. For example, in 2011 when the City incentivized 60 years of affordability for its main development program, Low-Income Housing Tax Credits, 100% of the developments pledged 60 years of affordability. **The City managed to double its affordable housing value with a stroke of the pen, all without any additional public subsidy.** A comprehensive analysis of affordability lengths for City-sponsored affordable housing developments from 1987-2007 is available in ANHD's 2010 report, *A Permanent Problem Needs A Permanent Solution: New York City's Next Affordable Housing Expiring-Use Crisis and the Need for Permanent Affordability.*

Recommendations for What to Build—Length of Affordability

Require that all City-subsidized housing be permanently affordable to ensure long-term sustainable affordable housing.

The Mitchell-Lama crisis of a few years ago is an example of the position the City finds itself in when it develops housing that is only affordable in the short-term. When the restrictions on a development expire, the City is stuck with a lose-lose situation: either vital, affordable housing disappears, or the City must overpay in order to preserve the affordability of these units under market conditions where owners can cash in on luxury rents.

The next mayor will face yet another expiring-use crisis as the affordable housing units developed under the Koch Housing plan are schedule to expire in the coming years. While affordability has generally been extended under the New Housing Marketplace, we have only delayed the next expiring-use crisis, not avoided it. We cannot afford to create yet another affordable housing plan that only thinks short-term. These affordable units are a public investment and must be protected and preserved by requiring permanent affordability.

There are financing and regulatory tools that have been utilized successfully in localities across the country that can be applied to achieve permanent affordability here in New York City. For instance, the City could:

- Require that any new project that utilizes City-owned land commit to a 99-year affordability covenant.
- Authorize the state and City to have a "Purchase Option" in any project developed on public land, with public subsidy, or benefiting from a tax abatement or zoning density bonus.
- Create a new property tax abatement, and require a mandatory extension of the project's affordability restrictions if the abatement is made available when the initial term expires.

Since affordable housing development is varied, there is no one-size-fits-all approach to permanence. The mechanisms and policies used to achieve long-term affordability will vary by program, funding source, and developer. Most important is that the next mayor embraces permanent affordability as a core principle that guides all publicly subsidized housing projects.

Beyond Housing—
How Can We Build Stronger Neighborhoods?

Affordable housing is a key part of a healthy neighborhood. But a successful building is often more than just housing units – it's a comprehensive community asset, bringing a return to the neighborhood and City as a whole beyond just more apartments.

One of the longtime strengths of City affordable housing development has been that it not only rebuilt and rejuvenated the housing stock, but that took a comprehensive community development approach. Retail was brought back; parks and community gardens were maintained; job training, childcare, and economic development programs were developed. A neighborhood civic infrastructure was put in place that continues to this day.

Comprehensive community development has been left to mission oriented organizations, often not-for-profit developers, whose broader contributions to the neighborhood need to be recognized and encouraged.

Unfortunately, under the Bloomberg administration's singular focus on 'units produced,' the City has moved away from this comprehensive community development approach. Yet it was this type of development that turned around our neighborhoods and reinvigorated communities. Now much of this comprehensive community development has been left to mission-oriented organizations, often not-for-profit developers, whose broader contributions to the neighborhood need to be recognized and encouraged.

Take for example Intervale Green, a 128 unit development in the South Bronx built by ANHD member WHEDCo. The 128 units make a huge impact – an impact that's quantified under the New Housing Marketplace. But what was not quantified were the additional services, amenities, and community space the development provides to the neighborhood such as:

1. 39 of the units set aside for formally homeless families, which help reduce homelessness.
2. A rooftop Urban Farm helps supply fresh produce in an area that's often been called a "food desert."
3. Half an acre of landscaped green space brings much needed open recreational space to the neighborhood.
4. Energy efficient appliances, nontoxic building materials, and other environmentally responsible components help reduce our carbon footprint and preserve our environment.
5. Most notably, the development is owned and operated by a community-based not-for-profit which allows the organization to continue its commitment of serving and working in the neighborhood through revitalizing the commercial corridor of Southern Boulevard, organizing community events, improving parks and green space, and advocating for improvements in street and subway safety.

Open space at WHEDCo Development

These contributions also need to be recorded and incorporated – as does creating local retail, community, and educational space, bringing services such as after school care and vocational training to neighborhoods, and creating local jobs and supporting local businesses. The City needs to approach development comprehensively, considering and filling other community needs as well as the need for affordable housing.

Recommendations for Future City Policy: What to Build—Community Impact

Approach housing development comprehensively by crediting and/or funding projects that address other locally established needs while providing affordable housing.

The NHMP did not require, nor did it incentivize, the inclusion of space beyond that for housing units in a development. While the dwelling units created through affordable housing are critical, these developments can and should contribute more to the community. Safe, comfortable, affordable places to live are the starting points of a strong neighborhood, and a necessary one. But neighborhoods also need services, amenities, spaces, partnerships and infrastructures that go beyond housing units.

Each new affordable housing development is an investment by the City in the community. As such, the next mayor must support developments that:

- Utilize responsible, local not-for-profit developers with community-based boards that strengthen the civic infrastructure and local capacity of the neighborhood.
- Incorporate services and amenities that strengthen local community residents such as clinics, childcare, workforce training facilities, and/or open public spaces.
- Create high quality, long-term local jobs, and/or create space and opportunities for local businesses.
- Reinvest in other community programs, initiatives and developments to meet the broader needs of the neighborhood.
- Meet top energy efficient standards and incorporate alternative energy sources and other environmentally responsible components, beyond those currently required.
- Create both housing and community infrastructure that is designed to continue to function during emergency situations, such as floods.

The City's affordable housing development policies should reflect a comprehensive community development strategy that works with neighborhoods and their residents. The next administration must approach affordable housing development as an opportunity meet a broader set of community needs.

Looking Ahead:

The next mayor of New York City has an extraordinary opportunity – the first in over a decade – to reshape the future of affordable housing development policy in our city to strengthen the impact on families and communities. It is imperative that he or she better align affordable housing programs and policies to reflect the needs of our residents and communities.

Neighborhoods have different needs. Some desperately need community services and retail options along with affordable housing. Others need more housing for large families or single senior citizens. There are neighborhoods that are rapidly becoming more expensive and need their affordable housing to stay affordable for future generations as well as the current residents. And yet others where the residents need deeply affordable housing for working families. It is not enough to simply produce units. Our affordable housing must be as unique as the communities and residents it serves. A one-size-fits-all solution doesn't fit New Yorkers, and it won't fit as an affordable housing solution. Addressing the City's growing affordable housing crisis must be a comprehensive, nuanced, and three-dimensional approach for the future.

ANHD is asking the question: What if we set different goals? What if we set the goal of building the kind of housing and neighborhoods that communities need? "Units Produced" is an easy measurement to quantify – quantifying Real Affordability is more difficult. But still, a large reason behind the success of the New Housing Marketplace was that it set a goal, and continually measured progress toward that goal. We need a new goal. **The City needs a new way of measuring success and measuring a return on public investment that takes into account the quality, not just quantity, of affordable housing built.**

The City needs a new way of measuring success and measuring a return on public investment that takes into account the quality, not just quantity, of affordable housing built.

The REAL AFFORDABILITY INDEX: A New Way of Measuring Return on Investment

Housing across all income levels is needed; so too, are smaller and larger units. However, by simply counting 'units produced,' production incentives are skewed toward creating smaller, less affordable units, which are superficially less expensive to create but do not necessarily provide the most public benefit. In addition, the City runs the risk of creating an imbalance in our affordable housing stock – an overabundance of supply in one area, and a scarcity in others.

ANHD's Real Affordability research above goes far beyond just cataloging what the City has built. Our analysis provides a more comprehensive understanding of the various facets that combine to make successful affordable housing developments in communities that are masked in the City's limited 'units produced' count. The New Housing Marketplace, and the affordable housing that will be developed under the next administration, is the affordable housing stock for an entire city – for residents of the future as well as the present. What makes them public assets as affordable housing are the legally binding affordability restrictions on the units themselves, and these legally binding restrictions are what we use to determine the affordability of these publicly-subsidized developments.

Therefore ANHD has developed a new metric for City affordable housing development, the ***Real Affordability Index.*** The Real Affordability Index combines indicators of unit size, length of affordability, depth of affordability, and community impact, and allows us to **calculate the City's return on investment as a comprehensive measure of the development's value.**

The Real Affordability Index can be graphically represented as:

The Real Affordability Index equation is:

$$\text{REAL AFFORDABILITY OF A DEVELOPMENT} = \frac{\text{\# of units}}{100} \times \left(\frac{\text{\# of People Served} \times \text{Years of Affordability}}{\text{Avg \% of Area Median Income (AMI) Served}} \right) + \text{COMMUNITY IMPACT}$$

As the box above illustrates, the Real Affordability Index is calculated by multiplying the number of people housed in a unit by the number of years a unit is required to be affordable, divided by the percent of Area Median Income that the unit serves. More specifically, these inputs are:

- 'Number of Units' is simply the number of units in the development project.
- 'Number of People Served' is calculated using 1.5 people per bedroom, and 1 for a studio, unless the size of individual households is available.
- 'Years of Affordability' is based on the signed regulatory agreement, unless the primary sponsor has a mission-driven commitment to provide affordable housing for low-income people as part of its Articles of Incorporation, in which case affordability is assumed to be permanent. ANHD is using 99 years in the equation in lieu of Permanent Affordability.
- 'Average % of AMI' is calculated by using the average income restrictions as they relate to the units. It should be noted that in many developments, most notably in-tenant preservation and supportive housing programs, the actual income of some tenants is often lower than the income restrictions on the unit. If there is a lower income household in the unit for which information is available, we use the lower income, but only if the highest registered legal rent of the unit also reflects this income. We do not count rent or operation subsidies in our calculation of income restrictions or public subsidy invested. It should also be noted that after initial qualification, tenants may generally earn any amount of money in subsequent years while still living in an income-restricted unit.
- 'Community Impact' reflects the concrete value a development brings to its residents and surrounding community beyond simply housing. Many affordable developments create much-needed retail options, social services, economic development or community facilities in addition to housing units. Because this impact is not a "per-unit" calculation, instead being an overall value brought to the community, it is quantified through a 10-point "booster" assigned to the development as a whole.

Below are two theoretical examples of how the Real Affordability Index can be used to calculate the amount of public benefit secured by the City. **Example 1** is an affordable housing development that has 10 studio units serving singles, each earning 60% AMI, with a 30-year regulatory agreement, and no other components. While it has 10 units, the Real Affordability impact for this development is only 5. **Example 2** is a development that has 10 two-bedroom units serving households of 3 each earning 40% AMI, with a 60-year regulatory agreement. In addition, the development has a much-needed child-care facility on the ground-floor. Here, even though it has the same 10 units, the Real Affordability Index score is 55. The larger score demonstrates the better return to the City based on serving three times as many people, at a deeper affordability level, for twice as long of an affordability period, with an additional community component.

EXAMPLE 1:

$$\text{Real Affordability Index Score} = \left(\frac{10}{100}\right) \times \frac{(1 \times 30)}{.60} + 0 = 5$$

EXAMPLE 2:

$$\text{Real Affordability Index Score} = \left(\frac{10}{100}\right) \times \frac{(3 \times 60)}{.40} + 10 = 55$$

While Example 2 does have a much higher Real Affordability Index score, this does not necessarily mean that the second project is a better public investment that the first. The second project almost certainly requires more public subsidy, as larger and more deeply affordable units all take more subsidy-per-unit. Longer-term affordability can sometimes require slightly greater public investment, and the additional retail component takes away square footage from the building, reducing its potential residential units. If the second development costs more than 11 times the public subsidy of the first development, the first development is a better public investment.

Measuring the Return on Public Investment

While the Real Affordability Index score shows the overall value of the public benefit of a particular project, policymakers need to go a step further in determining where to allocate public resources. ANHD's Return on Real Affordability determines how much public subsidy is required to create each unit of Real Affordability.

Determining how to calculate how much public subsidy goes into each affordable housing project is not a straightforward exercise. Subsidies take many unequal forms – direct equity, both taxable- and tax-exempt Bond financing, low-interest non-amortizing mortgages, real estate tax exemptions, operating subsidy. In addition, subsidies comes from different state, federal, and local sources, and range from unlimited and as-of-right, to severely constrained and narrowly targeted. However, in any development in which subsidy-per-unit is calculated, the Return on Real Affordability can also be calculated. Once subsidy is determined, instead of dividing by units, we simply divide by the overall Real Affordability Index score.

In order to illustrate the Return on Real Affordability, we will use real development project examples built under NHMP. HPD provided us with information on 20 projects including detailed subsidy information for each development. These developments utilized a variety of funding sources, such as the Participation Loan Program (PLP), Third Party Transfer Program (TPT), and/or Small Buildings Loan Program. HPD provided us with the amount of public City Capital, HOME funds, and Reso A money allotted for each project. We also received a detailed breakdown of each project's unit size and depth of affordability, allowing us to calculate each development's Real Affordability Index score. HPD's data did not include length of affordability and type of sponsor; as such we assumed a 30-year regulatory agreement for each project.

Below we calculate the traditional "number of units built per dollar of public subsidy" analysis and compare this to the ***Return on Real Affordability.*** We compare two separate 8-unit developments, one at 1264 and 1279 Decatur Street in Brooklyn, developed under the Participation Loan Program; the other at 459 West 147th Street in Manhattan, developed under the Small Building Loan Program. From this we can determine how efficient the project is in terms of the public benefit provided for the public subsidy spent.

Tables 12 and 13 provide a snapshot of the Decatur Street buildings. As Table 12 details, there are 8 units housing 30 people. Half are two-bedroom, and half are three-bedroom apartments. In terms of affordability, the units have a wide range, with a quarter at 50% AMI, half at 60% AMI, and a quarter at 120% AMI. The Decatur Street project does not have a community component.

TABLE 12: Unit Size by # of Bedrooms

	Decatur Street
Number of Bedrooms	**Number of Units**
0	
1	
2	4
3	4
# of Units	8
# of Ppl	8

TABLE 13: Targeted AMI by Unit Size

	Decatur Street			
	0 BR	**1 BR**	**2 BR**	**3 BR**
30%				
40%				
50%			1	1
60%			2	2
80%				
100%				
120%			1	1
175%				

Tables 14 and 15 below provide a snapshot of 459 West 147th street. As Table 14 details, there are 8 units, all studios, housing 8 people. In terms of affordability, three of the studios are at 60% AMI, and the other 5 are at 80% AMI. The West 147th Street project also does not have a community component.

TABLE 14: Unit SIze by # of Bedrooms

	West 147th Street
Number of Bedrooms	**Number of Units**
0	8
1	
2	
3	
# of Units	8
# of Ppl	8

TABLE 15: Targeted AMI by Unit SIze

	West 147th Street			
	0 BR	**1 BR**	**2 BR**	**3 BR**
30%				
40%				
50%				
60%	3			
80%	5			
100%				
120%				
175%				

A side-by-side comparison of the City's return on public investment for these two developments is captured below in **Table 16**. The Decatur Street project was developed with $151,411 in City Capital, and $1,050,000 in HOME funds, for a total of $1,201,411 in public subsidy, or $150,176 per unit. 459 West 147th Street was developed with $299,915 in City Capital and $302,500 in HOME funds, for a total of $602,415 in public subsidy, or $75,302 per unit. By the New Housing Marketplace's index, "units," the West 147th Street building is twice as good of an investment as the Decatur Street development.

TABLE 16: Public Return on Investment Comparison

	Decatur Street Development	West 147th St Development
Number of Units	8	8
City Capital	$151,411	$299,915
HOME Funds	$1,050,000	$302,500
Total Subsidy	$1,201,411	$602,415
Subsidy per Unit	$150,176	$75,302
Real Affordability Score	12.4	4.3
Subsidy per Unit of Real Affordability (Return on Real Affordability)	**$81,314**	**$178,493**

However, when measuring return on Real Affordability, a different story becomes clear. The large units, combined with the deeper affordability, gives the Decatur Street a Real Affordability index of 12.4. In contrast, the studio apartments of the West 147th street development, as well as the slightly higher affordability levels, give it a score of 4.3. While each unit produced in the Decatur Street building cost the City $150,176, each unit's Real Affordability cost to the City is only $81,314. At West 147th Street, while each unit cost the City $75,302, each unit's Real Affordability cost to the City is $178,493 – over twice that of the Decatur Street building. So while at first glance the West 147th street development seems like twice as efficient an investment as the Decatur Street one, with a closer look, we can see the opposite is actually true.

Closing

ANHD's *Real Affordability Index* will allow community leaders to advocate for the production of the types of units most needed in their communities. For instance, a community that needs larger family units would be able to point out that a development that consisted of a smaller number of three-bedroom units has a higher Real Affordability Index score than a development of a greater number of studio apartments, or a community that needs very low-income housing would be able to point out that a smaller number of very-low income units has a higher Real Affordability Index score than a greater number of middle-income units. This lets advocates, developers, and City officials shape the best housing policy for the City and its communities, instead of solely focusing on maximizing the units produced. Indeed, it is precisely these types of conversations that ANHD hopes to facilitate with candidates and the community during the next mayoral election.

Appendices

Methodology

New Housing Marketplace Data

ANHD obtained data on geography, unit size, and depth of affordability of the New Housing Marketplace through a Freedom of Information Act (FOIA) request from the Department of Housing Preservation and Development (HPD) and the Housing Development Corporation (HDC).

Because of the way HPD and HDC track the details of their units produced, different information was available for different components of the New Housing Marketplace. This leads to different datasets being used for different areas of analysis.

The largest dataset used is the entire 124,418 units of affordable housing developed from FY2004–FY2011 under the "New Housing Marketplace," for which ANHD received information on geography and broad affordability levels (<60% AMI, 60% - 80% AMI, 80% - 120% AMI, and 120% - 180% AMI). Analysis regarding geography of the New Housing Marketplace and broad affordability levels uses this dataset, except where indicated in the report. This dataset is shown in full as two appendices, one by geography and one by affordability.

A subset of this overall dataset - 38,670 units, which is the total developed under the New Housing Marketplace from FY2009–FY2011 - includes narrower affordability levels. These consist of <30% AMI units, and then 10% AMI increments up to the 180% AMI level, as well as a 60-65% AMI level, and 65%-70% AMI level. There are also three other categories provided: "Non-Restricted," "Other," and "Super Units" (usually rent-free units reserved for the superintendent of the building). When analyzing affordability levels, ANHD eliminated "Super Units" and "Other" from the dataset, and counted "Non-Restricted" units as being at the highest affordability level (180% AMI). This dataset is shown in full as an appendix.

Through the course of the New Housing Marketplace, HPD has not consistently tracked unit size. A dataset of 53,211 units was provided that contained specific unit sizes, which was cross-referenced with geography, but not with affordability. The sample includes the following units: all HPD Preservation and HPD New Construction projects started prior to July 2010, with a group of pre-July 2010 New Construction projects not included if they had completed in the last two years. ANHD paid HPD to re-configure its database to obtain some of this data. This dataset is shown in full as an appendix. Since our data request and reconfiguration, HPD has improved its database relating to unit size, and more comprehensive data may now be available.

A small dataset of 9,970 units, was also provided which cross-references unit size with the narrow AMI increments. This data is from a web based HPD tracking application called OnTrack used by HPD's Office of Development to track the loan closing process. The dataset is for New Construction projects started after July 2010, and a group of pre July 2010 New Construction starts if they completed in the past 2 years. This dataset was not included in our analysis of unit size in the NHMP, as it was limited to New Construction only, but was presented in full and analyzed separately in the "Housing for What Size Family?" section.

For length of affordability, ANHD referred to our previous analysis, first published in the spring of 2010 in our report, *A Permanent Problem Requires a Permanent Solution: New York City's Next Affordable Housing Expiring-Use Crisis and the Need for Permanent Affordability,* which tracks the length of affordability for city-sponsored developments from 1987-2007.

Finally, ANHD filed a separate Freedom of Information Request for specific HPD and HDC projects chosen at random, for which we received detailed information on the specific projects, including unit sizes, depth of affordability, and amount and type of public subsidy invested. Two of these projects are used as examples to calculate our "Return on Real Affordability," as a new way of examining the specific impact of each public dollar spent on affordable housing. We also received detailed information on public subsidy invested for all HDC projects.

Demographic Data

All demographic and income information comes from the United States Census Bureau's American Community Survey (ACS). This is sample data, and has a margin of error associated with it which is not displayed in our analysis. For median income levels and household sizes at the County (Borough) and City level, we used 1-year ACS data. ACS data is from calendar year 2010 unless otherwise noted. For geographies smaller than the County (Borough) level, 1-year ACS data is not available. For median income and household size at the Community District level, we used 5-year ACS data from 2006-2010, which is a sample of households taken over all five years, with income information adjusted for inflation to 2010 dollars. For 5-year data, the US Census uses Public Use Microdata Areas (PUMAs), which are approximately analogous to New York City's Community Districts, although not completely coterminous. For purposes of this analysis, we treated PUMAs and Community Districts as analogous.

Area Median Income Data

All Area Median Income (AMI) information was taken from the Department of Housing and Urban Development's (HUD's) HUD User Database. For specific information on how HUD AMI levels are determined, please see www.huduser.org

HUD only provides AMI levels for various household sizes, and does not provide an overall AMI level for all households. When comparing AMI to the Median Income for New York City Households, we prorated the HUD AMI to the average household size of the city. When comparing AMI to the Median Income for households in specific Community Districts, we prorated the HUD AMI to the average household size of that specific Community District.

When comparing AMI to the Median Income for New York City households for the life of the NHMP data analyzed (FY2004 - FY2011), we took 1-year ACS data for each year available (2005-2010), compared it to the HUD AMI, prorated for the average household size for each corresponding year, and averaged the results (we did not adjust for the slight population differences between these years). When comparing AMI to the Median Income for New York City for the smaller dataset of the NHMP from FY2009 – FY2011, we compared the HUD AMI for 2010 against the one-year ACS data for 2010 (citywide analysis) or the 5 year ACS for 2006-2010, which is expressed in 2010 dollars (Community District analysis).

When translating the number of actual New York City households in each 10% AMI bands, we took 2010 1-year ACS data, which provides income in the following bands:

Less than $10,000
$10,000 to $14,999
$15,000 to $24,999
$25,000 to $34,999
$35,000 to $49,999
$50,000 to $74,999
$75,000 to $99,999
$100,000 to $149,999
$150,000 to $199,999
$200,000 or more

We then determined the corresponding income for each 10% AMI band (prorated for the average household size), assumed incomes were evenly distributed throughout each band provided by the ACS, and re-allocated them accordingly. We express this as the top end of the 10% income band, so the percentage of New Yorkers at the 60% AMI level is the percentage of New Yorkers making between 50% and 60% of AMI.

Matching Unit Sizes to Household Sizes

ANHD matched unit sizes to the household sizes of New York City in order to determine if the unit sizes built under the New Housing Marketplace were in alignment with the different sizes of New York City households. To do so, ANHD applied a standard of 1.5 people per bedroom, with 1 person for a studio or SRO. As the table below explains how this standard was applied to unit sizes in order to generate the different types of households served at each unit size.

ANHD Calculated Household Size by Unit Size

Unit Size	ANHD Calculated Household Size
SRO	100% to 1-person households.
0-BR	100% to 1-person households.
1-BR	50% to 1-person households, 50% to 2-person households.
2-BR	25% to 2-person households, 50% to 3-person households, 25% to 4-person households.
3-BR	16.7% to 3-person households, 33.3% to 4-person households, 33.3% to 5-person households, 16.7% to 6-person households.
4-BR	25% to 6-person households, 75% to 7+ person households.
5-BR	100% to 7+ person households.
6-BR	100% to 7+ person households.

Determining Affordability

When determining depth of affordability, HPD and HDC provided upper income limits for the various units, expressed as a percentage of Area Median Income. For instance, a 60% AMI unit means that nobody making over 60% of the Area Median Income is allowed to rent the apartment. However this does not indicate the lowest possible income a household could have and still qualify to rent the unit.

While the upper-income limit for units developed under the New Housing Marketplace has consistently been tracked as a percentage of AMI, there has not been a consistent methodology for determining the lower-income limit of these income bands. Depending on program, year, and level of affordability, different methodologies have been used, resulting in many different income band sizes. In this report we have applied a standard 10% AMI income band to all NHMP units -- i.e., we count a 60% AMI unit as being affordable to anyone making between 50% and 60% of AMI. This also corresponds to the 10% cohorts used to analyze the New Housing Marketplace, as well as the incomes of New York City households, as demonstrated above.

ANHD analyzes the affordability of the New Housing Marketplace by unit, not by household. In calculating affordability, we refer exclusively to the unit's income restrictions provided to us by HPD and HDC. It should be noted that in many developments, most notably supportive housing developments, the actual income of some tenants is often lower than is indicated by the income restrictions on the unit, usually due to rental or other operational subsidies making up the rent differentials. In other preservation programs where tenants are already in place, incomes and rents may be lower for the current household occupying the unit than are reflected in the overall restrictions on the unit. Because of this, it is important to note that the lack of very low-income apartments developed under the New Housing Marketplace does not necessarily reflect a lack of very low-income New Yorkers currently served by these developments. Conversely, it should also be noted that after initial qualification tenants may generally earn any amount of money in subsequent years while still living in an income-restricted unit.

New Housing Marketplace Units by Area Median Income (AMI) FY2004-FY2011

PRE-FY2009

Percent AMI	Number	% of NHMP
0-60%	19,951	23.3%
61-80%	53,980	63.0%
81-100%	4,944	5.8%
101-120%	1,043	1.2%
121-180%	5,830	6.8%
Non-Restricted	0	0.0%
Super	0	0.0%
Total Pre-FY2009	**85,748**	**100.0%**

All NHMP

	Number	% of NHMP
0-60%	42,513	34.2%
61-80%	60,580	48.7%
81-100%	6,356	5.1%
101-120%	1,842	1.5%
121-180%	10,431	8.4%
Non-Restricted	2,273	1.8%
Super	182	0.1%
Other	241	0.2%
Total NHMP	**124,418**	**100.0%**

POST-FY2009

	Number	% of NHMP
0-30%	1,389	3.6%
31-40%	1,660	4.3%
41-50%	4,606	11.9%
51-60%	14,907	38.5%
61-70%	2,895	7.5%
71-80%	3,705	9.6%
81-90%	437	1.1%
91-100%	975	2.5%
101-110%	341	0.9%
111-120%	458	1.2%
121-130%	773	2.0%
131-140%	2,457	6.4%
141-150%	91	0.2%
151-160%	86	0.2%
161-170%	704	1.8%
171-180%	490	1.3%
181-250%	0	0.0%
Non-Restricted	2,273	5.9%
Super	182	0.5%
Other	241	0.6%
Total Post-FY2009	**38,670**	**100.0%**

New Housing Marketplace Units by Community District FY2004-FY2011

BROOKLYN

COMMUNITY DISTRICT		UNITS	% BORO	% CITY
BK1	Greenpoint / Williamsburg	2,891	9.6%	2.3%
BK2	Brooklyn Hts / Ft. Greene	2,933	9.7%	2.4%
BK3	Bed-Stuy	3,174	10.5%	2.6%
BK4	Bushwick	2,330	7.7%	1.9%
BK5	Cypress Hills / ENY / Starrett	5,269	17.4%	4.2%
BK6	Carroll Gardens / Gowanus / PS	363	1.2%	0.3%
BK7	Sunset Park / Windsor Terrace	451	1.5%	0.4%
BK8	Crown Hts / Prospect Hts	1,468	4.9%	1.2%
BK9	Crown Hts So. / Pros Lef Gardens	1,406	4.7%	1.1%
BK10	Bay Ridge / Dyker Hts / Ft. Ham	302	1.0%	0.2%
BK11	Bensonhurst / Gravesend	21	0.1%	0.0%
BK12	Borough Pk / Kensington	252	0.8%	0.2%
BK13	Brighton Beach / Coney Is.	3,109	10.3%	2.5%
BK14	Ditmas Pk / Flatbush	459	1.5%	0.4%
BK15	Sheepshead Bay / Gravesend	1,226	4.1%	1.0%
BK16	Brownsville / Ocean Hill	4,179	13.8%	3.4%
BK17	East Flatbush	233	0.8%	0.2%
BK18	Flatlands / Canarsie	158	0.5%	0.1%
TOTAL		**30,224**	**100.0%**	**24.3%**

QUEENS

COMMUNITY DISTRICT		UNITS	% BORO	% CITY
QN1	Astoria / Long Island City	519	4.3%	0.4%
QN2	Sunnyside / Woodside	1,092	9.1%	0.9%
QN3	E. Elmhurst / Jackson Hts.	59	0.5%	0.0%
QN4	Corona / Elmhurst / Lefrak City	37	0.3%	0.0%
QN5	Maspeth / Mid Village / Ridgewood	28	0.2%	0.0%
QN6	Forest Hills / Rego Pk	76	0.6%	0.1%
QN7	Flushing / Bay Terrace /Whitestone	453	3.8%	0.4%
QN8	Jamaica / Fresh Meadows	2,598	21.8%	2.1%
QN9	Kew Gardens / Ozone Pk	165	1.4%	0.1%
QN10	Howard Beach / Ozone Pk	42	0.4%	0.0%
QN11	Douglaston / Little Neck	23	0.2%	0.0%
QN12	Hollis / Rochdale / St. Albans	1,361	11.4%	1.1%
QN13	Bellerose / Laurelton / Queens Vil	98	0.8%	0.1%
QN14	Arverne / Far Rockaway / Seaside	5,392	45.1%	4.3%
TOTAL		**11,943**	**100.0%**	**9.6%**

BRONX

COMMUNITY DISTRICT		UNITS	% BORO	% CITY
BX1	Melrose / Mott Haven	6,545	17.3%	5.3%
BX2	Hunts Pt / Longwood	4,245	11.2%	3.4%
BX3	Crotona Pk E / Morrisania	6,005	15.9%	4.8%
BX4	Concourse / Highbridge / Mt. Eden	3,181	8.4%	2.6%
BX5	Fordham / Mt. Hope / Univers Hts	4,098	10.8%	3.3%
BX6	Belmont / East Tremont	3,567	9.4%	2.9%
BX7	Bedford Pk / Kingsbr Hts / Norwood	3,430	9.1%	2.8%
BX8	Fieldston / Riverdale	563	1.5%	0.5%
BX9	Castle Hill / Parkchester Soundview	3,377	8.9%	2.7%
BX10	Co-Op City / Pelham Bay / Throgs Neck	949	2.5%	0.8%
BX11	Morris Park / Pelham Parkway	991	2.6%	0.8%
BX12	Baychester / Williamsbridge	892	2.4%	0.7%
TOTAL		**37,843**	**100.0%**	**30.4%**

MANHATTAN

COMMUNITY DISTRICT		UNITS	% BORO	% CITY
MN1	FiDi / Tribeca	28	0.1%	0.0%
MN2	W. Village / Soho	1,391	3.3%	1.1%
MN3	Chinatown / LES	7,881	18.6%	6.3%
MN4	Chelsea / Clinton	6,869	16.2%	5.5%
MN5	Union Sq / Midtown East	99	0.2%	0.1%
MN6	Stuy Town / Turtle Bay	637	1.5%	0.5%
MN7	UWS / Manhattan Valley	2,727	6.4%	2.2%
MN8	UES / Yorkville	511	1.2%	0.4%
MN9	Hamiliton Hts / W. Harlem	2,598	6.1%	2.1%
MN10	Central Harlem	10,352	24.4%	8.3%
MN11	East Harlem	7,829	18.4%	6.3%
MN12	Inwood / Washington Hts.	1,540	3.6%	1.2%
TOTAL		**42,462**	**100.0%**	**34.1%**

STATEN ISLAND

COMMUNITY DISTRICT		UNITS	% BORO	% CITY
SI1	Stapleton / St. George	1,774	91.2%	1.4%
SI2	South Beacon / Willowbrook	137	7.0%	0.1%
SI3	Tottenville / Great Kills	35	1.8%	0.0%
TOTAL		**1,946**	**100.0%**	**1.6%**

TOTAL CITYWIDE	**124,418**	**100%**	**100%**

New Housing Marketplace Units by Size and Community District, FY2004-FY2010

BROOKLYN									
CB	0-BR	1-BR	2-BR	3-BR	4-BR	5-BR	6-BR	Unknown	TOTAL
BK1	226	419	551	247	24	0	0	0	1,467
BK2	644	526	243	216	43	1	0	21	1,694
BK3	210	534	630	267	19	2	1	160	1,823
BK4	103	559	641	207	11	7	3	49	1,580
BK5	468	373	605	341	69	12	3	1	1,872
BK6	3	20	15	52	2	0	0	0	92
BK7	52	95	36	5	0	0	0	0	188
BK8	39	129	271	99	3	0	0	0	541
BK9	30	197	58	79	0	0	0	1	365
BK10	0	0	0	0	0	0	0	0	0
BK11	0	0	0	0	0	0	0	0	0
BK12	12	0	1	1	0	0	0	0	14
BK13	57	443	778	0	0	531	0	7	1,816
BK14	105	58	20	29	12	0	0	0	224
BK15	0	0	0	0	0	0	0	0	0
BK16	350	746	954	540	68	2	0	9	2,669
BK17	46	15	75	34	2	0	0	0	172
BK18	0	1	3	2	0	0	0	0	6
TOTAL	**2,345**	**4,115**	**4,881**	**2,119**	**253**	**555**	**7**	**248**	**14,523**
Percent	**16.1%**	**28.3%**	**33.6%**	**14.6%**	**1.7%**	**3.8%**	**0.0%**	**1.7%**	**100.0%**

QUEENS									
CB	0-BR	1-BR	2-BR	3-BR	4-BR	5-BR	6-BR	Unknown	TOTAL
QN1	32	230	39	2	0	0	0	0	303
QN2	0	16	0	1	0	0	0	0	17
QN3	0	3	9	0	0	0	0	0	12
QN4	0	1	8	1	0	0	0	0	10
QN5	0	0	2	1	0	0	0	0	3
QN6	0	0	0	0	0	0	0	0	0
QN7	0	0	4	6	0	0	0	0	10
QN8	0	81	0	0	0	0	0	0	81
QN9	0	12	1	2	0	2	0	0	17
QN10	0	1	4	8	1	0	0	0	14
QN11	0	0	0	0	0	0	0	0	0
QN12	41	105	78	87	8	0	0	0	319
QN13	0	2	5	7	0	0	0	0	14
QN14	4	171	696	762	2	0	0	0	1,635
TOTAL	**77**	**622**	**846**	**877**	**11**	**2**	**0**	**0**	**2,435**
Percent	**0.0%**	**3.2%**	**25.6%**	**34.8%**	**36.0%**	**0.5%**	**0.1%**	**0.0%**	**100.0%**

BRONX									
CB	**0-BR**	**1-BR**	**2-BR**	**3-BR**	**4-BR**	**5-BR**	**6-BR**	**Unknown**	**TOTAL**
BX1	561	797	1,305	513	126	10	2	3	3,317
BX2	170	643	987	355	91	14	6	170	2,436
BX3	433	686	1,070	224	37	0	0	7	2,457
BX4	234	792	711	220	14	0	0	252	2,223
BX5	124	594	677	151	20	0	0	169	1,735
BX6	338	450	584	56	1	0	0	526	1,955
BX7	290	606	226	58	1	0	0	0	1,181
BX8	84	39	24	5	0	0	0	0	152
BX9	2	298	117	247	116	0	0	0	780
BX10	35	353	232	70	0	0	0	0	690
BX11	74	45	45	7	0	0	0	0	171
BX12	12	333	151	43	0	0	0	0	539
TOTAL	**2,357**	**5,636**	**6,129**	**1,949**	**406**	**24**	**8**	**1,127**	**17,636**
Percent	**13.4%**	**32.0%**	**34.8%**	**11.1%**	**2.3%**	**0.1%**	**0.0%**	**6.4%**	**100.0%**

MANHATTAN									
CB	**0-BR**	**1-BR**	**2-BR**	**3-BR**	**4-BR**	**5-BR**	**6-BR**	**Unknown**	**TOTAL**
MN1	4	24	0	0	0	0	0	0	28
MN2	15	5	1	0	0	0	0	0	21
MN3	739	1,517	1,068	328	0	0	0	0	3,652
MN4	620	1,020	396	2	0	0	0	0	2,038
MN5	0	0	0	0	0	0	0	0	0
MN6	36	174	15	0	0	0	0	0	225
MN7	379*	151	76	30	0	0	0	0	636
MN8	76	156	21	1	0	0	0	0	254
MN9	259	283	558	373	132	17	2	60	1,684
MN10	1,156	1,486	2,346	868	217	34	1	103	6,211
MN11	354	838	820	290	35	2	0	3	2,342
MN12	223	262	311	164	10	10	0	8	988
TOTAL	**3,861**	**5,916**	**5,612**	**2,056**	**394**	**63**	**3**	**174**	**18,079**
Percent	**21.4%**	**32.7%**	**31.0%**	**11.4%**	**2.2%**	**0.3%**	**0.0%**	**1.0%**	**100.0%**

***includes 123 SRO units**

STATEN ISLAND									
CB	**0-BR**	**1-BR**	**2-BR**	**3-BR**	**4-BR**	**5-BR**	**6-BR**	**Unknown**	**TOTAL**
SI1	72	138	126	87	8	0	0	0	431
SI2	29	63	12	0	0	0	0	1	105
SI3	0	0	0	2	0	0	0	0	2
TOTAL	**101**	**201**	**138**	**89**	**8**	**0**	**0**	**1**	**538**
Percent	**18.8%**	**37.4%**	**25.7%**	**16.5%**	**1.5%**	**0.0%**	**0.0%**	**0.2%**	**100.0%**

CITYWIDE									
	0-BR	**1-BR**	**2-BR**	**3-BR**	**4-BR**	**5-BR**	**6-BR**	**Unknown**	**TOTAL**
TOTAL	**8,741**	**16,490**	**17,606**	**7,090**	**1,072**	**644**	**18**	**1,550**	**53,211**
Percent	**16.4%**	**31.0%**	**33.1%**	**13.3%**	**2.0%**	**1.2%**	**0.0%**	**2.9%**	**100.0%**

New Housing Marketplace Units by Neighborhood Affordability, FY2009-FY2011

Community Board	Median Household Income	Average Household Size	Prorated income of average household as % of AMI	Number of NHMP units affordable to the average neighborhood household (10% income bands)	% of NHMP units affordable to the average neighborhood household (10% income bands)	0-30%	31-40%	41-50%	51-60%	61-65%	66-70%	71-80%	81-90%	91-100%	101-110%	111-120%	121-130%	131-140%	141-150%	151-160%	161-170%	171-180%	Non-Restricted	Super	other	Total
BROOKLYN																										
BK1	$ 41,540	2.53	61.5%	433	70.8%	25	34	105	252	10	7	56	0	0	0	3	88	0	0	0	0	32	0	3	0	615
BK2	$ 66,371	2.11	103.3%	663	100.0%	0	345	83	174	0	0	44	0	17	0	0	0	0	0	0	0	0	0	4	0	667
BK3	$ 34,519	2.73	49.9%	136	20.2%	28	27	81	300	10	2	99	10	8	2	12	86	5	0	0	0	0	3	4	3	680
BK4	$ 35,072	2.07	54.8%	309	85.4%	31	16	97	165	0	0	40	0	8	3	2	0	0	0	0	0	0	0	2	13	377
BK5	$ 32,998	2.89	46.9%	157	10.6%	50	40	67	1,103	4	0	126	9	3	8	18	50	0	0	0	0	0	0	4	0	1,482
BK6	$ 85,985	2.29	130.9%	102	68.9%	42	3	0	0	0	0	41	0	0	2	4	10	0	0	0	0	0	46	1	20	169
BK7	$ 40,938	3.01	57.4%	0	0.0%	0	0	0	0	0	0	4	0	0	0	0	0	0	0	0	0	0	0	0	0	4
BK8	$ 39,236	2.33	59.4%	257	55.3%	6	0	9	241	1	8	13	31	4	0	10	47	2	41	0	4	48	0	4	8	477
BK9	$ 37,779	2.58	55.6%	354	48.4%	62	11	148	133	0	0	8	0	366	0	3	0	0	0	0	0	0	0	3	0	734
BK10	$ 52,245	2.54	77.2%	8	88.9%	0	0	0	0	0	0	8	0	0	0	0	0	0	0	0	0	1	0	0	0	9
BK11	$ 39,012	2.71	56.5%	0	0.0%	0	0	0	0	0	0	21	0	0	0	0	0	0	0	0	0	0	0	0	0	21
BK12	$ 39,349	3.39	52.9%	12	14.6%	12	0	0	0	0	0	68	0	0	0	0	2	0	0	0	0	0	0	0	0	82
BK13	$ 32,280	2.33	48.9%	869	41.6%	0	16	853	1,158	0	0	10	0	52	0	0	0	0	0	0	0	0	0	1	0	2,090
BK14	$ 42,049	2.81	60.2%	101	72.1%	0	0	0	101	0	0	33	2	0	2	0	0	0	0	0	0	2	0	0	0	140
BK15	$ 47,522	2.52	70.4%	558	100.0%	539	0	0	0	0	0	19	0	0	0	0	0	0	0	0	0	0	0	2	1	561
BK16	$ 27,240	2.65	39.7%	48	4.9%	0	48	245	564	4	10	102	0	2	0	4	0	0	0	0	0	0	0	7	3	989
BK17	$ 45,088	2.87	64.2%	8	16.3%	1	2	2	2	1	0	22	1	1	4	2	5	3	1	0	2	0	0	0	25	74
BK18	$ 61,668	2.98	86.7%	32	26.4%	0	0	2	0	0	0	25	5	3	3	0	0	9	0	0	0	74	0	0	1	122
TOTAL BROOKLYN				4,047	44.4%	796	542	1,692	4,193	30	27	739	58	464	24	58	288	19	42	0	6	157	49	35	74	9,219
BRONX																										
BX1	$ 20,037	2.95	28.3%	45	1.9%	45	107	118	1,631	121	58	225	12	5	5	36	0	0	39	0	0	26	0	20	20	2,468
BX2	$ 20,037	2.95	28.3%	42	2.1%	42	186	279	1,071	9	15	207	21	1	10	88	71	0	0	0	0	0	14	19	0	2,033
BX3	$ 21,617	2.87	30.8%	55	3.8%	10	45	109	766	14	10	453	0	47	0	0	1	0	0	0	0	0	0	7	28	1,490
BX4	$ 26,738	2.90	37.9%	74	9.2%	19	55	227	245	14	6	90	0	113	36	0	0	0	0	0	0	0	0	4	28	837
BX5	$ 26,131	3.08	36.3%	158	11.1%	134	24	161	726	47	39	162	6	0	16	0	2	0	0	0	16	0	95	5	3	1,436
BX6	$ 21,617	2.87	30.8%	175	18.2%	165	10	40	605	6	8	40	2	0	0	1	0	0	0	86	0	0	0	6	14	983
BX7	$ 29,179	2.80	41.9%	281	32.5%	11	46	224	202	22	11	72	203	23	49	0	2	0	0	0	0	0	0	6	0	871
BX8	$ 52,301	2.42	78.4%	221	56.2%	0	0	48	36	0	0	137	0	0	0	38	0	1	0	0	0	33	100	8	0	401
BX9	$ 38,475	2.86	54.8%	170	55.6%	11	2	91	66	3	3	120	0	2	0	8	0	0	0	0	0	0	0	2	0	308
BX10	$ 50,893	2.40	76.5%	247	97.2%	0	160	0	70	0	0	17	4	0	0	0	0	3	0	0	0	0	0	0	0	254
BX11	$ 45,276	2.75	65.3%	127	73.4%	2	123	0	0	0	2	35	0	2	0	6	0	0	2	0	0	1	0	1	0	174
BX12	$ 45,686	2.96	64.4%	113	33.8%	0	11	32	60	10	0	143	58	3	1	9	7	0	0	0	0	0	0	3	0	337
TOTAL BRONX				1,708	15.0%	439	769	1,329	5,478	246	152	1,701	306	196	117	186	83	4	41	86	16	60	209	81	93	11,592
MANHATTAN																										
MN1	$100,788	1.85	162.0%	0	0.0%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MN2	$100,788	1.85	162.0%	54	13.0%	0	0	0	33	7	0	6	0	0	0	0	0	0	8	0	0	44	316	0	0	414
MN3	$ 40,009	2.21	61.5%	2,969	89.1%	1	3	356	403	1,049	1,157	302	0	0	0	2	23	0	0	0	0	0	38	4	0	3,338
MN4	$ 78,621	1.65	129.7%	400	26.7%	0	54	279	37	0	0	10	0	0	0	0	20	216	0	0	274	0	609	3	0	1,502
MN5	$ 78,621	1.65	129.7%	1	100.0%	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
MN6	$ 96,599	1.78	156.7%	0	0.0%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MN7	$ 97,087	1.95	154.1%	385	64.6%	0	0	23	361	0	0	1	0	0	0	0	0	0	0	0	211	0	0	1	0	597
MN8	$100,109	1.84	161.1%	20	100.0%	0	0	7	2	0	0	0	0	8	0	3	0	0	0	0	0	0	0	0	0	20
MN9	$ 37,001	2.52	54.8%	542	75.1%	79	68	111	284	29	41	48	19	2	0	41	0	0	0	0	0	0	0	7	0	729
MN10	$ 32,579	2.33	49.4%	451	18.9%	38	126	287	1,343	4	1	228	16	4	0	23	183	0	0	0	0	0	132	11	59	2,455
MN11	$ 30,330	2.57	44.7%	167	7.9%	23	54	90	1,510	43	0	42	8	0	0	45	79	0	0	0	13	114	106	8	0	2,135
MN12	$ 38,318	2.80	55.0%	232	77.1%	0	0	41	118	73	9	31	25	4	0	0	0	0	0	0	0	0	0	4	0	305
TOTAL MANHATTAN				5,221	46.0%	141	305	1,194	4,091	1,205	1,208	669	68	18	0	114	305	216	8	0	498	158	1,201	38	59	11,437
QUEENS																										
QN1	$ 48,777	2.29	74.3%	131	53.0%	0	0	95	29	0	0	7	0	17	0	0	91	0	0	0	0	0	8	3	0	250
QN2	$ 54,236	2.55	80.1%	348	57.5%	0	0	0	320	0	16	12	0	256	0	1	0	0	0	0	0	0	0	4	2	611
QN3	$ 47,478	3.26	64.7%	4	11.1%	0	0	0	4	0	0	31	0	1	0	0	0	0	0	0	0	0	0	0	1	37
QN4	$ 41,858	3.14	57.8%	0	0.0%	0	0	0	0	0	0	23	0	0	0	0	0	0	0	0	0	0	0	0	0	23
QN5	$ 53,913	2.79	77.4%	12	100.0%	1	1	0	0	1	0	9	0	0	0	0	0	0	0	0	0	0	0	0	0	12
QN6	$ 62,314	2.20	95.9%	35	46.1%	0	0	0	0	0	0	25	0	10	0	1	0	0	0	0	0	40	0	0	0	76
QN7	$ 53,249	2.78	76.5%	130	98.5%	3	19	0	72	0	0	36	0	0	0	2	0	0	0	0	0	0	0	1	0	133
QN8	$ 56,179	2.66	81.9%	185	7.2%	0	0	159	0	0	0	26	0	0	0	2	0	2,208	0	0	184	0	0	17	0	2,596
QN9	$ 54,522	3.21	74.7%	140	92.7%	0	0	3	113	0	0	24	0	0	0	11	0	0	0	0	0	0	0	1	2	154
QN10	$ 59,064	3.24	80.7%	11	47.8%	0	2	2	0	0	0	7	0	1	0	9	0	2	0	0	0	0	0	0	0	23
QN11	$ 72,578	2.69	105.4%	16	100.0%	2	0	0	0	0	0	14	0	0	0	0	0	0	0	0	0	0	0	0	0	16
QN12	$ 51,535	3.12	71.3%	152	31.9%	1	19	70	6	1	3	52	2	4	196	53	1	0	0	0	0	69	0	0	6	483
QN13	$ 75,147	3.19	103.2%	30	69.8%	2	2	0	5	1	1	15	3	1	0	11	0	2	0	0	0	0	0	0	0	43
QN14	$ 47,813	2.69	69.4%	0	0.0%	0	0	0	0	0	0	104	0	2	0	0	0	2	0	0	0	0	806	0	3	917
TOTAL QUEENS				1,194	22.4%	9	43	329	549	3	20	385	5	292	196	90	92	2,214	0	0	184	109	814	26	14	5,360
STATEN ISLAND																										
SI1	$ 56,580	2.77	81.4%	833	97.3%	0	0	62	595	0	4	172	0	4	4	6	5	2	0	0	0	2	0	2	1	859
SI2	$ 70,286	2.81	100.7%	28	96.6%	4	1	0	1	0	0	21	0	1	0	0	0	0	0	0	0	1	0	0	0	29
SI3	$ 83,573	2.83	119.5%	22	81.5%	0	0	0	0	0	0	18	0	0	0	4	0	2	0	0	0	3	0	0	0	27
TOTAL S.I.				883	96.8%	4	1	62	596	0	4	211	0	5	4	10	5	4	0	0	0	6	0	2	1	915
TOTAL NYC				13,053	34.1%	1,389	1,660	4,606	14,907	1,484	1,411	3,705	437	975	341	458	773	2,457	91	86	704	490	2,273	182	241	38,670

ANHD Member Organizations

BRONX
Alliance For Progress, Inc.
Banana Kelly Community Improvement Association, Inc.
Belmont Arthur Avenue Local Development Corporation
Beulah HDFC Inc.
Fordham Bedford Housing Corporation
MBD Community Housing Corporation
Mid Bronx Senior Citizens Council
Neighborhood Housing Services of North Bronx, Inc
Neighborhood Housing Services of South Bronx.
Neighborhood Initiatives Development Corporation (NIDC)
New Settlement Apartments (NSA)
Northwest Bronx Community and Clergy Coalition
Nos Quedamos
Promesa Systems, Inc.
University Neighborhood Housing Program
West Bronx Housing and Neighborhood Resource Center
Women's Housing & Economic Development Corporation (WHEDCO)

BROOKLYN
Astella Development Corporation
Bedford Stuyvesant Restoration Corporation
Bridge Street Development Corporation
Brighton Neighborhood Association
Brooklyn Congregations United
Brooklyn Neighborhood Improvement Association
Church Avenue Merchants Business Association (CAMBA)
Cypress Hills Local Development Corporation
Erasmus Neighborhood Federation
Fifth Avenue Committee
Flatbush Development Corporation
Greater Sheepshead Bay Development Corporation
Los Sures (Southside United)
Mutual Housing Association of NY/MHANY Management Inc
Neighbors Allied for Good Growth
Neighborhood Housing Services of Bedford Stuyvesant
Neighborhood Housing Services of East Flatbush
Neighbors Helping Neighbors
Northeast Brooklyn Housing Development Corporation
People's Firehouse, Inc.
Pratt Area Community Council
Ridgewood Bushwick Senior Citizens Council, Inc.
Sabaoth Group
Southern Brooklyn Community Organization
St. Nicks Alliance
UPROSE

MANHATTAN
Abyssinian Development Corporation
Asian Americans for Equality (AAFE)
Audubon Partnership for Economic Development LDC
Clinton Housing Development Company
Community League of the Heights
Community Pride
Cooper Square Committee
Cooper Square Mutual Housing Association
Ecumenical Community Development Organization (ECDO)
Goddard-Riverside Community Center
Good Old Lower East Side
Harlem Congregations for Community Improvement (HCCI)
Hope Community Inc.
Housing Conservation Coordinators
Lower Eastside Coalition Housing Development, Inc.
Lower Eastside Peoples Mutual Housing Association (LESPMHA)
Manhattan Valley Development Corporation
Mirabal Sisters Cultural and Community Center, Inc.
Neighborhood Housing Services of New York City
Northern Manhattan Improvement Corporation
Palladia, Inc.
SFDS Development Corporation
University Settlement Society of New York
Washington Heights-Inwood Coalition
West Harlem Group Assistance, Inc.
West Side Federation for Senior and Supportive Housing, Inc. (WSFSSH)

QUEENS
Central Astoria LDC
Centro Hispano "Cuzcatlan"
Chhaya Community Development Corporation
Immigrant Tenant Advocacy Project – Catholic Migration Office
Make The Road New York
Margert Community Corporation
MinKwon Center for Community Action
Neighborhood Housing Services of Jamaica
Neighborhood Housing Services of Northern Queens
Northwest Queens Housing Corporation
Ocean Bay Community Development Corporation
Queens Community House, Inc
Queens Congregations United For Action
Woodside on the Move, Inc.

STATEN ISLAND
Neighborhood Housing Services of Staten Island
Northfield Community Local Development Corporation of Staten Island
Project Hospitality
Senior Housing Resource Corporation And The Community Agency For Senior Citizens, Inc.

ASSOCIATION FOR NEIGHBORHOOD
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